

CITY OF KIRKLAND Planning and Building Department 123 5th Avenue, Kirkland, WA 98033 425.587.3600 - <u>www.kirklandwa.gov</u>

ADVISORY REPORT FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

To:	Kirkland Hearing Examiner	
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From:	17-0	Jennifer Anderer, Proje

Jennifer Anderer, Project Planner

Date: September 22, 2021

File: PSE SAMMAMISH-JUANITA 115kV ELECTRICAL TRANSMISSION LINE, ZON20-00104

Hearing Date and Place:

September 30, 2021 at 9:30 AM City Hall Council Chamber 123 Fifth Avenue, Kirkland

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I. INTRODUCTION

A. APPLICATION

- 1. <u>Applicant</u>: Kerry Kriner on behalf of Puget Sound Energy (PSE)
- 2. <u>Request</u>: New 5-mile 115kV transmission line spanning three jurisdictions: The City of Redmond, unincorporated King County, and the City of Kirkland. The portion of the project located in Kirkland, WA begins at the intersection of Willows Road NE and NE 124th Street, incorporates upgrades to the Totem Substation, and ends at the Juanita Substation. PSE is proposing 40 new transmission line poles, one new stub pole, 17 replacement transmission poles, and two replacement distribution poles within Kirkland. Substation improvements include the installation of a dead-end tower, a switch, and bus supports to accommodate the new line in and out of the Totem Substation.
- 3. <u>Project Route</u>: The project corridor is approximately 5-miles long and spans three jurisdictions including the City of Redmond, unincorporated King County, and the City of Kirkland. The proposed route begins at the Sammamish Substation in Redmond, WA (9221 Willows Road NE), loops around the Totem Substation in Kirkland, WA (13209 NE 123rd St) and ends at the Juanita Substation in Kirkland, WA (10910 NE 132nd St) (see Attachment 1).
- 4. <u>Corridor Segments</u>: The plan set (see Attachment 2) breaks the entire corridor into 24 individual segments with segments 11 through 24 being located within Kirkland. This analysis will focus only on the segments within Kirkland and pertinent segments will be referenced throughout this report.
- 5. <u>Review Process</u>: Process IIA, Hearing Examiner conducts public hearing and makes final decision.
- 6. <u>Summary of Key Issues and Conclusions</u>:
 - a. Compliance with standards for Public Utility, Electrical Transmission Lines (see pages 8-9, Section II.E.1)
 - b. Compliance with Public Agency Exemption standards for wetland impacts (see pages 9-13, Section II.E.2)
 - c. Mitigation Requirements (see pages 13-20, Section II.E.3)

B. RECOMMENDATIONS

Based on Statements of Fact and Conclusions (Section II), and Attachments in this report, we recommend approval of this application subject to the following conditions:

- 1. This application is subject to the applicable requirements contained in the Kirkland Municipal Code, Zoning Code, and Building and Fire Code. It is the responsibility of the applicant to ensure compliance with the various provisions contained in these ordinances. Attachment 3, Development Standards, is provided in this report to familiarize the applicant with some of the additional development regulations. This attachment does not include all the additional regulations. When a condition of approval conflicts with a development regulation in Attachment 3, the condition of approval shall be followed.
- 2. As part of the land surface modification permit, the applicant shall submit plans that are consistent with the proposed plans found in Attachment 2, the proposed tree retention and restoration standards found in Attachment 14 and Attachment 15, and the proposed mitigation plans found in Attachment 11.
- 3. Prior to the final inspection of the land surface modification permit, the applicant

shall:

- a. Submit a signed agreement with the City detailing the fee in lieu of supplemental tree plantings for tree removal within the Cross Kirkland Corridor (see Conclusion II.E.4.B.2).
- b. Complete the required wetland and wetland buffer enhancement improvements proposed in Attachment 11 and incorporate the recommendations found in Attachments 8 (see Conclusions II.E.3.b.1 and II.E.3.b.2).
- c. Submit an as-built plan and report prepared by the applicant's consultant for inspection by the City's consulting qualified critical area professional at the applicant's expense (see Conclusion II.E.3.b.2).
- 4. Trees shall not be removed or altered following approval except as approved by the Planning and Building Department. The Applicant's arborist report (see Attachment 14) and tree restoration plan (see Attachment 15) contains specific information concerning tree retention requirements and mitigation standards.
- 5. The applicant shall submit monitoring reports at required intervals, as outlined in Attachment 11, to the Planning and Building Department for review by the City's consulting qualified critical area professional at the applicant's expense (see Conclusions II.E.2(b)(6)).
- 6. The record of payment for credits shall be provided to the City in advance of the authorized impacts but no later than issuance of the building or land surface modification permit (see Conclusion II.E.3(b)(2)).

II. FINDINGS OF FACT AND CONCLUSIONS

A. SITE DESCRIPTION

- 1. Site Development and Zoning:
 - a. <u>Facts</u>:
 - (1) Size: The portion of the transmission line corridor located within the City of Kirkland represents approximately 3.12 miles of the full 5-mile corridor. Within Kirkland, the transmission line is proposed to run west from Willow Road along the north side of NE 124th Street and interconnects with an existing transmission line west of the existing north/south Beverly-Renton transmission line The existing east/west transmission line corridor corridor. continues west and heads south across NE 124th Street through an easement to the Totem Substation. The poles within this easement will be located within the jurisdiction of the City of Redmond on parcel no. 2726059041. After looping through the Totem Substation, the transmission line heads north within the new corridor across NE 124th Street and onto the Cross Kirkland Corridor until reaching I-405. The transmission line crosses I-405 to a City of Kirkland parcel and then runs north along the east side of 120th Avenue NE in the street right-of-way. At the intersection of 120th Avenue NE and NE 124th Street the line will head west along the north side of NE 124th Street where it will interconnect with PSE's existing Sammamish – Moorlands #1 transmission line. South of NE 124th Street poles will be replaced, and a switch will

be added for the interconnection. Poles will also be replaced along the exiting corridor from south of NE 124^{th} Street up to NE 128^{th} Street and on to the Juanita Substation Site.

- (2) <u>Land Use</u>: The proposed City of Kirkland portion of the transmission line corridor runs through multiple land use districts including City of Kirkland right-of-way, I-405 right-of-way, Commercial Use, Office Use, Cross Kirkland Corridor, Multi-Family Residential, and Single Family Residential.
- (3) <u>Zoning</u>: The proposed City of Kirkland segment of the transmission line corridor runs through multiple zoning districts including Public right-of-way, RM 2.4, TL 6A, TL 7B, TL 7A, TL 4B, TL 6B, TL 11, Public Park, RSX 7.2, RM 3.6.
- (4) <u>Terrain and Vegetation</u>: The proposed corridor is located within open public rights-of-way, developed private property, and utility easements. Poles located within identified critical areas and critical area buffers are subject to Public Agency Exemption review (see Conclusion II.E.2(b)).
- b. <u>Conclusions</u>:
 - (1) The size and location of the proposed transmission line are not constraining factors in the Public Utility Electrical Transmission Lines review.
 - (2) The location of the proposed transmission line is a factor in the Public Agency Exemption application. The presence of adjoining wetlands and/or streams at the following locations are the basis for the Public Agency Exemption proposal:
 - Wetlands and streams adjoining the Cross Kirkland Corridor east of 132nd Avenue NE and Totem Lake Boulevard NE within segment 16 in the Plan Set (see Attachment 2)
 - (b) Wetlands and streams east of Juanita High School and south of NE 128th Street within segment 23 in the Plan Set (see Attachment 2)
- 2. Neighboring Development and Zoning:
 - a. <u>Facts</u>: The proposed City of Kirkland segment of the transmission line runs through multiple land use districts summarized below:

Corridor	Adjacent Zoning					
(Attachment 1)	North	South	East	West		
11	TL 7B	City of Redmond	-	-		
12	TL 7B	City of Redmond	-	TL 6A		
13	TL 7B	RM 2.4, City of Redmond	City of Redmond	RM 2.4, TL 6A, TL 7B		
14	TL 9A, TL 7B	TL 7B	-	-		
15	Park, TL 9A	TL 7A, TL 7B	-	-		
16	Park, TL 7A	TL 7A	-	-		
17	-	-	TL 5	TL 4A		
18	-	-	I-405 ROW	TL 4B		
19	-	-	TL 4B, I-405 ROW	TL 4B		
20	TL 6B	TL 10A, TL 4B	-	-		
21	RM 3.6	TL 11	-	-		
22	-	-	RM 3.6	-		
23	-	TL 11 and Park	RM 3.6, TL 11, Park	RSX 7.2		
24	-	RM 3.6	RSX 7.2	RSX 7.2		

Commercial Uses: TL 4A, TL 4B, TL 5, TL 6A, TL 6B, TL 7A, TL 7B, TL 9A, TL 10A, TL 11,

Multi-Family Uses: RM 2.4, RM 3.6

- Single Family Uses: RSX 7.2
- b. <u>Conclusion</u>: The neighboring development and zoning are not constraining factors in the review of the application.

B. HISTORY

- 1. <u>Facts</u>:
 - a. <u>Totem Substation:</u> This property (Parcel No. 2726059084) was annexed into the City of Kirkland on 06/2011. PSE records indicate that the substation was constructed in the early 1980's. Prior to the substation development the property contained a single-family home. At the time of construction, the surrounding land uses were low density and by the 1990's commercial and multi-family uses filled in around the substation property.
 - b. <u>Juanita Substation:</u> This property (Parcel No. 2926059007) was annexed into the City of Kirkland on 01/1988. The previous substation was located

at the southern end of the property near NE 128th Street. The current substation development was approved to be located within the northern portion of the property near the NE 132nd Street right-of-way under ZON08-00010 and was built under BLD09-00235 in 2010.

- c. <u>Overhead Power Lines:</u> Aerial imagery shows that the existing Sammamish-Vitulli Tap transmission line located along the north side of NE 124th appears to be constructed in the early 1980's, around the same time as the Totem Substation. Earliest available aerial imagery shows the existing transmission lines near the Juanita Substation were built prior to 1998.
- 2. <u>Conclusion</u>: The history of the Totem Substation, Juanita Substation, and transmission corridor locations are not constraining factors in the review of this application.

C. PUBLIC COMMENT

The formal public comment period for the project ran from April 2, 2020 to April 20, 2020. Pursuant to KZC 150.35, a Process IIA Staff Report must include all comments received by the City prior to distribution of the staff report. Comments received on the proposed application and full applicant responses are included in Attachment 4. The comment themes with staff and applicant responses are summarized below.

Replacement Pole Location and Material: Request that the replacement poles in the residential neighborhood near the Juanita Substation be made from wood and located in the same location as each existing pole. All old electrical poles should be completely removed.

<u>Applicant Response:</u> Replacement poles will be made from wood and located generally in the same location as the existing poles. The existing pole material and replacement pole material of the replacement poles near the Juanita Substation (segments 23 and 24) are as follows:

Pole ID	Existing P	ole	Proposed
	Material		Replacement Pole
			Material
4/11	wood		glu lam or wood
4/12	wood		wood
4/13	wood		wood
4/14	wood		wood
4/15	wood		wood
4/16	wood		wood
4/17	wood		wood

The installation process starts with installing new or replacement poles adjacent to the existing poles. PSE then installs new transmission wires on the new poles and transfers the existing underbuilt distribution wire to the new poles. Finally, communication companies will transfer their respective wires to the new poles and PSE will remove the old poles and restore the disturbed area.

Underground Power Lines: The power poles near Juanita High School and the Juanita Substation should be installed underground due to a high number of overhead lines.

<u>Staff Response:</u> The City of Kirkland does not have code requiring the replacement poles to be installed underground.

<u>Applicant Response:</u> The existing transmission poles support not only PSE transmission and distribution lines, but also other providers' communication lines. State tariffs governs the undergrounding of PSE distribution lines and requires cost sharing on the part of the party requesting the undergrounding. Since the City of Kirkland does not have a code requirement to underground these lines, PSE has no authority to require communications companies to underground their lines.

Route Location: KZC 115.107.4.c states that the project should be sited to minimize and mitigate impacts to schools and residential areas. The applicant provided siting and design analysis recommends avoiding NE 132nd Street due to proximity to schools and residential developments, but the proposed route is very close to other schools and residential developments particularly an existing Montessori School located at 12345 120th Avenue NE and a proposed 400 unit residential development located at a vacant lot adjacent to the south of the Montessori School. The route should cross I-405 at NE 124th Street instead of NE 116th Street to avoid the school and future developments.

<u>Staff Response:</u> KZC 115.107.4.c requires applicants to consider schools and residential areas when siting a new public utility or electrical transmission line but does not require consideration for proposed or potential future developments. PSE's siting analysis (See Attachment 9) details how impacts to the Montessori School are mitigated by locating the proposed line on the east side of 120th Avenue NE on the opposite side from the school.

<u>Applicant Response:</u> The presence of schools and residences along the proposed route were considered during the siting and design process but were not the only factor being considered. For example, while schools and residential uses were looked at along NE 132nd Street, engineering and constructability challenges are what ultimately ruled out that alternative.

Likewise, the potential I-405 crossing options included NE 118th Street, NE 124th Street, NE 128th Street, and NE 132nd Street. Ultimately the NE 118th Street crossing was selected because it was the option that WSDOT agreed to permit. Factors such as engineering, constructability, ability to acquire easement rights, and compatibility with existing and planned infrastructure all impact PDE's ability to choose the lines route. The crossing at NE 118th Street also has the benefit of being least impactful to property owners as PSE has existing rights to site the line within the Cross Kirkland Corridor (CKC) and this corridor avoids crossing public property to reach I-405.

Conflict with other utilities: The Northshore Utility District (NUD) has been in ongoing discussions with the King County Wastewater Treatment Division (KCWTD) to serve anticipated growth by diverting sewage flows easterly along the Cross Kirkland Corridor (CKC) to KCWTD's York Pump Station facility located at NE 124th Street and Willows Road. PSE's proposed transmission line could pose a significant impact to NUD's ability to provide long term sewer service to the Totem Lake area if the transmission lines are located within the CKC. NUD requests that PSE's proposal be designed to accommodate the installation of future public sewer mains within the CKC.

<u>Staff Response:</u> The Kirkland Zoning Code (KZC) details criteria that PSE was

required to address while siting and designing the transmission line. These criteria do not require an applicant to site a line based on possible future developments.

<u>Applicant Response:</u> PSE acquired easement rights for the Cross Kirkland Corridor in 2011 from the Port of Seattle and is relying on those rights to construct the proposed 115KV transmission line. PSE and King County have been coordinating on this project since 2013 to ensure compatibility of the proposed transmission line with the King County's easements and underground facilities such as sewer lines. At present, the Northshore Utility District does not have any operating rights in the CKC, and any future rights would be subordinate to the rights of the current easement holders. It is inappropriate to deny the condition of PSE's permit based on future, speculative decisions and property interests including the potential for the Northshore Utility District to pursue rights in the corridor.

D. STATE ENVIRONMENTAL POLICY ACT (SEPA)

- 1. <u>Facts</u>: A Determination of Nonsignificance (DNS) was issued on November 18, 2020. The Environmental Checklist, Determination, and additional environmental information are included as Attachment 5.
- 2. <u>Conclusion</u>: The City has satisfied all the procedural requirements for SEPA.

E. APPROVAL CRITERIA

1. PUBLIC UTILITY, ELECTRICAL TRANSMISSION LINES (KZC 115.107)

The following is a review in a checklist format, of compliance with the decisional criteria and analysis requirements of KZC 115.107, under which the City may approve a new electrical transmission line. The proposed project complies with the requirements as proposed or conditioned below.

Complies as proposed	Not Applicable	Complies as conditioned	DECISIONAL CRITERA	
		KZ	C 115.107.4 and 5 – Submittal Requirements	
\boxtimes			In order to establish compliance, the applicant must submit a siting and design analysis describing how the proposed route and project design were selected including an assessment of the decisional criteria detailed in KZC 115.107.4 and analysis criteria detailed in KZC 115.107.5. Staff Comment/Analysis: The applicant submitted a Code	
			Compliance Siting and Design Analysis dated February 2020 (see Attachment 6).	
	KZC 115.107.4.a – Critical Areas, Buffers, and Significant Trees			
\boxtimes			Applicant must demonstrate that to the extent feasible the project has been sited and designed to minimize and mitigate impacts to critical areas, critical area buffers, and significant trees.	

		Staff Comment/Analysis: Applicant has demonstrated that the		
		project has been designed and sited to minimize and mitigate		
		impacts to critical areas and critical area buffers (see Section		
		II.E.3) and provided an analysis of site design (see Attachment 6).		
KZC 115.107.4.b – Views Designated in the Comprehensive Plan				
		Applicant must demonstrate that to the extent feasible the project has been sited and designed to minimize and mitigate impacts to views from public properties and rights-of-way that are designated in the City's Comprehensive Plan.		
		<u>Staff Comment/Analysis:</u> Applicant has addressed siting and design strategies used to mitigate impacts to City views through pole placement and construction materials and coordination with proposed City gateway projects (see Attachment 6).		
		KZC 115.107.4.c – Schools and Residential Areas		
		Applicant must demonstrate that to the extent feasible the project has been sited and designed to minimize and mitigate impacts to schools and residential areas.		
		<u>Staff Comment/Analysis:</u> Applicant has detailed community outreach and siting and design considerations that will be implemented to minimize impacts to school and residential uses in the provided Siting and Design Analysis (see Attachment 6).		

[
Complies as proposed	Not Applicable	Complies as conditioned	SITING AND DESIGN ANAYSIS CRITERIA	
			KZC 115.107.5.a – Decisional Criteria Compliance	
			Applicant should assess how the proposal meets the City's decisional criteria detailed in KZC 115.107.4 and justify the siting and design relative to those criteria.	
			<u>Staff Comment/Analysis:</u> Applicant has demonstrated compliance with the City's decisional criteria (see Section II.E.1 for staff analysis and Attachment 6 for applicant analysis).	
			KZC 115.107.5.b – Technology and Design Features	
			The applicant shall assess potential technologies and design features that would mitigate the visual and environmental impacts associated with the transmission line.	
			<u>Staff Comment/Analysis:</u> Applicant has identified consideration of potential technologies and design features in the provided analysis of site design (see Attachment 6)	
	KZC 115.107.c – Radio Frequency Interference Mitigation			

	The applicant must address potential technologies and design features used to mitigate radio frequency interference.
	<u>Staff Comment/Analysis:</u> Applicant has demonstrated compliance with all applicable federal standards and guidelines for 115 kV transmission lines. The applicant provided analysis of site design details route locations chosen to avoid any real or perceived technology conflicts (see Attachment 6).

2. PUBLIC AGENCY AND PUBLIC UTILITY EXEMPTIONS (KZC 90.45)

- a. <u>Facts:</u>
 - (1) The proposed improvements associated with segments 16 and 23 are located within and adjacent to Wetland K-K, Stream K-6, Wetland K-L, and Stream K-5.
 - (2) The applicant submitted a wetland delineation report prepared by AECOM, dated October 2019 (see Attachment 7). The report was prepared pursuant to KZC 90.110. Pursuant to KZC 90.105 the report identified twelve wetlands and four streams that were mapped in or near the City of Kirkland study area.
 - (3) The applicant's report was reviewed by the City's consulting biologist, The Watershed Company on September 4, 2020, confirming the presence of twelve wetlands and four streams and detailing required revisions for compliance with KZC 90 standards. (see Attachment 8).
 - (4) The applicant submitted a revised final delineation report prepared by AECOM on February 2021 to include The Watershed Company's revision requests (see Attachment 9).
 - (5) The proposed transmission line includes new and replacement power poles within critical areas and critical area buffers identified on the City of Kirkland Critical Area Map (see Attachment 10).
 - (6) Pursuant to KZC Section 90.35.3 replacement, installation, or construction of new utility structures are exempt from KZC 90 standards only if located within an existing improved right-of-way, exiting legally improved private roadway, utility corridor, or the Cross Kirkland Corridor and Eastside Rail Corridor.
 - (7) Pole 3/1 located in corridor segment 16 and pole 4/10 located in corridor segment 23 (see Attachment 2) are proposed within critical areas or their associated buffers on private property and therefore do not meet the exemption standards of KZC 90.35.3. Pole 3/1 is located within Stream K-6's and Wetland K-K's critical area buffers. Pole 4/10 is located within Wetland K-L.
 - (8) KZC Section 90.45 states that if the strict application of Chapter 90 would prohibit a development proposed by a public agency, the agency may apply for an exception pursuant to this section. The City of Kirkland meets the definition of a public agency.
 - (9) The applicant submitted a Transmission Line Impact Assessment and wetland modification with mitigation proposal prepared by AECOM dated February 2021 (see Attachment 11).
 - (10) The applicant is requesting a Public Agency Exception (PAE) to exempt the project from certain requirements of KZC Chapter 90. Specifically, the PAE will be used for the following sections of KZC 90:

- (a) KZC 90.55 Wetlands and Associated Buffer Standards for impacts associated with Wetlands K-K and K-L
- (b) KZC 90.65 Streams and Associated Buffer Standards for impacts associated with Streams K-6
- (11) The applicant's Transmission Line Impact Assessment details temporary and permanent impacts due to installation of new or replacement power poles (see Attachment 2). The following is a summary of permanent and temporary impacts associated with new poles 3/1 and 4/10 as part of the Public Agency Exemption request:
 - (a) New 115 kV Pole: 3/1 Corridor Segment 16 (see Attachment 2)
 - i. <u>Temporary Impacts to Wetland K-K and Stream K-</u> <u>6</u>: zero sq. ft.

Pole 3/1 is being located on a previously development private property in a location that is currently paved.

ii. <u>Permanent Impacts to Wetland K-K and Stream K-</u> <u>6:</u> zero sq. ft. Pole 3/1 is being located on a previously

Pole 3/1 is being located on a previously development private property in a location that is currently paved.

- (b) New 115 kV Pole: 4/10 Corridor Segment 23 (see Attachment 2)
 - i. Temporary Impacts to Wetland K-L and Stream K-5: 5,215 sq. ft.

Pole 4/10 will be replaced within the wetland and stream buffer resulting in temporary and permanent impacts.

ii. Permanent Impacts to Wetland K-L and Stream K-5: 15 sq. ft.

Pole 4/10 will be replaced within the wetland and stream buffer resulting in permanent and permanent impacts.

KZC 90 does not permit critical area or buffer impacts as proposed, except those impacts considered exempt from KZC 90 standards per KZC 90.35.3. The project's permanent and temporary impacts to the critical areas and their associated buffers located on private property are being processed as a Public Agency Exemption.

- (12) Zoning Code section 90.45.3 states that a public agency exception application may be approved if:
 - (a) There is no other practical alternative to the proposed project with less impact on the critical areas or buffer;

<u>Staff Response:</u> The applicant's proposal minimizes impacts to critical areas through mitigation sequencing (see Attachment 11 and Attachment 12) and where feasible avoids critical areas and critical area buffers while still meeting engineering and permitting requirements.

(b) Strict application of this chapter would unreasonably restrict or prohibit the ability to provide public utilities or

public agency services to the public;

<u>Staff Response:</u> The strict application of Chapter 90 would prohibit installation of new transmission poles within a critical area or a critical area buffer if located on private property. This would prohibit both pole 3/1 and 4/10 from being installed and interrupting the proposed route which has been identified as the least impactful to critical areas regulated under KZC 90 while complying with the public utility and electrical transmission line standards in KZC 115.107 and meeting the goals of the Comprehensive Plan (see Section F).

(c) The proposal minimizes impacts to the critical area or buffer through mitigation sequencing, and through type and location mitigation, pursuant to KZC 90.145 and 90.150, if applicable, including such installation measures as locating facilities in previously disturbed areas, boring rather than trenching, and using pervious or other low impact materials; and

<u>Staff Response:</u> The proposal has met the mitigation sequencing requirements of KZC Section 90.145 (see Section II.E.3).

(d) The proposal protects and/or enhances critical area and buffer functions and values, consistent with the best available science and with the objective of no net loss of critical area functions and values.

> <u>Staff Response:</u> The project will mitigate for direct and indirect impacts to the identified critical areas resulting in no net loss of critical area function. The mitigation plan uses the best available science guidance by Washing State Department of Ecology.

- b. <u>Conclusions:</u>
 - (1) A Public Agency Exception is required to allow the permanent and temporary critical area and buffer impacts and an exception from the vegetative buffer standards.
 - (2) The Watershed Company's review with the recommendations in the applicant's report concluded that the proposed transmission line requires unavoidable critical area impacts and complied with the applicable decisional criteria for a Public Agency Exception under KZC 90.45.3.
 - (3) Based on the following analysis, the application meets the established criteria in KZC Section 90.45.3 for approving a Public Agency Exception.
 - (a) There is no other practical alternative to the proposed project with less impact on the critical areas or buffer;
 - (b) Strict application of this chapter would unreasonably restrict or prohibit the ability to provide public utilities or public agency services to the public;
 - (c) The proposal minimizes impacts to the critical area or buffer through mitigation sequences, and through type and location of mitigation, pursuant to KZC 90.145 and

90.150, if applicable, including such installation measures as locating facilities in previously disturbed areas, boring rather than trenching, and using pervious or other low impact materials;

- (d) The proposal protects and/or enhances critical area and buffer functions and values, consistent with the best available science and with the objective of no net loss of critical area functions and values.
- (4) As part of the land surface modification permit submittal, the applicant should submit plans that are consistent with the proposed plans found in Attachment 2, the proposed mitigation plans found in Attachments 11 and 12, and the recommendations from the City's consulting biologist found in Attachment 8.
- (5) Prior to final inspection of the land surface modification permit, the applicant should complete the required restoration work and submit a report prepared by the applicant's consultant. The work will be subject to inspection and final acceptance by the Planning and Building Department's sensitive areas consultant at the applicant's expense.
- (6) The applicant should submit monitoring reports to the Planning and Building Department for review by the Planning and Building Department's sensitive areas consultant at the applicant's expense.

3. MITIGATION SEQUENCING (KZC 90.145)

Pertinent Corridor Segments: The following section covers segments 16 and 23 of the Plan Set (see Attachment 2).

- a. Facts: Modifications to a critical area and/or buffer must be evaluated using mitigation sequencing as required in KZC 90.145. Additionally, modifications to wetlands must be evaluated using the standards established in KZC 90.150.
 - (1) <u>Order of Preference</u>
 - (a) KZC 90.145 states that the intent of mitigation sequencing is to evaluate and implement opportunities to avoid, minimize, eliminate, or compensate for impacts to critical areas while still meeting the objectives of the project. When a modification to a critical area and buffer is proposed, the modification shall be avoided, minimized, or compensated for, as outlined by WAC 197-11-768, in the following order of preference (KZC 90.145.2.a to f):
 - Avoiding the impact altogether by not taking a certain action or parts of actions;
 - Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
 - Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
 - Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
 - Compensating for the impact by replacing or providing substitute resources or environments; and/or
 - Monitoring the impacts and compensation projects and taking appropriate corrective measures.

A mitigation sequencing evaluation for the proposal was prepared by AECOM, dated February 2021 (see Attachment 11). As outlined in the applicant's report and discussed in the table below, the measures taken include:

- <u>Avoid:</u> The project was designed to avoid temporary and permanent impacts to most critical areas within the project corridor.
- <u>Minimize:</u> Where impacts could not be avoided minimization techniques will be implemented. Proposed techniques include placing access and staging equipment on existing gravel or paved surfaces, use of temporary timber mats to provide temporary access to Pole 4/10, preventing damage from heavy equipment, and identification of multiple access points in case one route proves to be unfit once construction begins.
- <u>Rectify:</u> Impacts caused by construction will be restored once construction is completed.
- <u>Reduce or eliminate impacts</u>: A proposed mitigation and maintenance plan has been prepared to reduce impacts to identified critical areas and buffers with restoration to eliminate temporary impacts where feasible.
- <u>Compensate:</u> The project proposes mitigation for unavoidable critical area and critical area buffers. Any temporary impacts due to construction will be restored once construction is completed.
- <u>Monitoring</u>: The project will require a 5-year Monitoring and Maintenance Plan of the proposed mitigation plan consistent with KZC 90.160.
- (b) The City's consulting critical areas professional, The Watershed Company (TWC), reviewed the applicant's mitigation sequencing evaluation and concluded that the proposal complies with mitigation requirements per a response memo dated June 16, 2021 (see Attachment 13)
- (2) <u>Mitigation Requirements</u> Requirements for mitigation are found in KZC 90.145.3 to 5, KZC 90.145.6.b, and KZC 90.150. The following is a review, in a checklist format, of compliance with these requirements.

Complies as proposed	Not Applicable	Complies as conditioned	CODE SECTION
			Location of Mitigation
\square			KZC 90.145.3.a – Preference shall be given to the location of the
			mitigation in the following order unless it can be demonstrated that
			off-site in-kind mitigation is ecologically preferable:
			1) Un-site in-kind;

	2) Off-site in City in-kind;
	3) Off -site in-kind within the Lake
	Washington/Cedar/Sammamish Watershed
	<u>Staff Comment/Analysis</u> : The applicant is proposing to mitigate the installation of new transmission poles, removal and replacement of existing poles, within the wetland and stream buffer, along with the temporary construction impacts and stringing sites, which are any space used for stringing the electrical lines, through enhancement of the critical areas for temporary impacts. Permanent impacts will be compensated for through the purchase of credits at a certified mitigation bank in King County, the Keller Farm Mitigation Bank (see Attachments 12). The various mitigations are proposed at various credit ratios with the mitigation bank.
	On-Site versus Off-Site Mitigation
	KZC 90.145.3.b(1) – Mitigation shall occur on-site except when the City determines that the following criteria have been met as part of a proposal under this chapter:
	 a) There is no opportunity for on-site mitigation or on-site opportunities do not have a high likelihood of success due to the size of the property, site constraints, or size and quality of the wetland or location and quality of the stream; b) Off-site mitigation has a greater likelihood of providing equal or improved critical area functions than the impacted critical area; c) Off-site locations shall be in the same Water Resource Inventory Area (WRIA) 9 Lake Washington/Cedar/Sammamish Watershed as impacted critical area; and d) The off-site critical area mitigation will best meet formally established watershed goals for water quality, flood or conveyance, habitat, or other wetland functions that have been established and strongly justify location of mitigation at another site.
	<u>Staff Comment/Analysis</u> : The applicant is proposing to mitigate on- site where appropriate and proposed off-site mitigation compliant with KZC 90.145.3.b(1).
	KZC 90.145.3.b(2) – When considering mitigation outside of the City, preference should be given to using mitigation banking or an in-lieu fee program pursuant to subsection (4) of this section.
	<u>Staff Comment/Analysis:</u> The applicant is proposing to use mitigation banking for permanent wetland, stream, and buffer impacts not suitable for on-site in-kind or off-site in City in-kind and a fee in-lieu agreement with the City of Kirkland to mitigate required tree removal from within critical area buffers.

Complies as proposed Not Applicable Complies as	CODE SECTION						
Mitigation for lo	Responsible Party for Mitigation Site						
streams shall us	the following options in subsections a and/or b below:						
	KZC 90.145.4.a – Applicant-Responsible Mitigation The applicant is responsible for the implementation, monitoring, and success of the mitigation pursuant to this chapter.						
	Staff Comment/Analysis: The applicant is proposing to be responsible for the implementation, monitoring, and success of the mitigation plan on site for temporary impacts and Mitigation Bank credits for permanent impacts.						
	 KZC 90.145.4.b - Non-applicant Responsible Mitigation – Mitigation Bank and In-Lieu Fee Mitigation 1) Fund are collected from the applicant by the sponsoring agency, nonprofit, private party, or jurisdiction. The sponsor is responsible from that point forward for the completion and success of the mitigation. The applicant's fee is based on the project impact and includes all costs for the mitigation including design, land acquisition, materials, construction, administration, monitoring, and stewardship. 2) Credits purchased by an applicant from a mitigation bank or in-lieu program that is certified under federal and state rules may be used as a method of mitigation if approved by the City to compensate for impacts when all the following apply: a. The City determines as part of the critical area approval that it would provide appropriate compensation for the proposed impacts; b. Projects shall have debits associated with the proposed impacts calculated by the applicant's qualified critical area professional using the credit assessment for the impact as specified in the approved instrument for the program. The assessment shall be reviewed and approved by the City; c. The proposed use of credits is consistent with the terms and conditions of the certified mitigation bank or in-lieu fee program instrument; d. The record of payment for credits shall be provided to the City in advance of the authorized impacts but no later than issuance of the building or land surface modification permit. 						

		areas and the associated buffers and fee in-lieu mitigation for tree removal within critical area buffers. A record of payment for credits and a signed fee in lieu agreement will be provided to the City prior to issuance of the land surface modification permit.
		City-Responsible Mitigation – Advanced Mitigation
		KZC 90.145.4.c – The City does mitigation on City-owned property as mitigation credit either for City critical area projects or at the discretion of the City for other public agencies with critical area projects. The mitigation program shall be implemented pursuant to federal and state rules, and state water quality regulations. <u>Staff Comment/Analysis:</u> The applicant is not proposing use of advanced mitigation
		Timing of Mitigation
\square		K7C 90 145 5 a – On-Site Mitigation
		 On-site mitigation shall be completed immediately before or following disturbance and prior to use or final inspection of the activity or development. Construction of mitigation projects shall be timed to reduce impacts to existing fisheries, wildlife, and flora; and The Planning Official may allow flexibility with respect to seasonal timing of excavation or planting for mitigation. If on-site mitigation must be completed after final inspection of a building or land surface modification permit or commencement of an activity, a performance financial security shall be required pursuance to KZC 90.165 along with a timeline commitment for completion.
		<u>Staff Comment/Analysis:</u> The applicant is proposing to commence work in 2022. The proposed mitigation installation is proposed to begin following construction
\square		K7C 90 145 5 b – Off-Site Mitigation
		 For in-lieu fee, mitigation bank, or advance mitigation programs:
		 a. Mitigation shall be completed based on the program's established timeline, except advance mitigation shall be completed prior to issuance of the development permit; b. The applicant shall provide documentation of proof of purchase of credits for in-lieu fee and mitigation banking in advance of the authorized impacts but no later than issuance of the building or land surface modification permit. However, if the program sponsor requires proof of development permit prior to credit purchase, the documentation may be provided to the City prior to final inspection; and c. For advanced mitigation, the applicant shall submit documentation of completion of the advance

	mitigation prior to issuance of a land surface modification of building permit.
	<u>Staff Comment/Analysis</u> : The applicant is proposing to commence work in 2022. A record of payment for mitigation banking credits and fee in-lieu payments will be provided to the City in compliance with KZC 90.145.5.b.
	 KZC 90.145.5.b(2) – For all other off-site mitigation: a) Mitigation shall be completed immediately before or following disturbance and prior to use or final inspection of the activity or development. Construction of mitigation projects shall be timed to reduce impacts to existing fisheries, wildlife, and flora. The Planning Official may allow flexibility with respect to seasonal timing of excavation or planting for mitigation; and b) Documentation of the proof of purchase of off-site property shall be provided in advance of the authorized impacts but no later than issuance of the building or land surface modification permit.
	<u>Staff Comment/Analysis:</u> The applicant is proposing to use mitigation banking credits for permanent impacts and is not proposing any additional off-site mitigation.
	Mitigation Plan Standards
	KZC 90.145.6.b(1) – Plans shall show that the vegetative buffer standards and requirements in KZC 90.130 are met. If the buffer does not currently meet the vegetative buffer standards, a detailed final revegetated plan shall be submitted including specification on size and type of each native species of plants, and number and spacing of the plants meeting the City of Kirkland's Critical Area Plant List and standards.
	<u>Staff Comment/Analysis:</u> KZC 90.45 Public Agency Exception allows public utilities an exemption from KZC 90.145.6.b(1-4) if vegetative buffer standards cannot be met due to the scope of work. Vegetation buffer standards identified in KZC 90.145.6.b(1-4) cannot be fully met due to safety standards of vegetation near transmission lines and the need for on-going future maintenance of the transmission line infrastructure.
	KZC 90.145.6.b(2) - Seed source must be as local as possible, and plants must be nursery propagated unless transplanted from on-site areas approved for disturbance. These requirements must be included in the mitigation plan specifications.
	<u>Staff Comment/Analysis:</u> The applicant proposes to re-seed temporarily exposed soils resulting from project activities in critical areas and their associated buffers using a mixed native seed mix in combination with mulch to reduce the potential of sediment entering the aquatic resource areas.

		KZC 90.145.6.b(3) – Plant materials may be supported with material (e.g., stakes, guy wires) only when necessary. Staking and ties shall follow the International Society of Arboriculture standards. Where support is necessary, stakes, guy wires, or other measures must be removed as soon as the plan can support itself, usually after the first growing season.
		Staff Comment/Analysis: The applicant is not proposing any plantings requiring support materials.
	\boxtimes	KZC 90.145.6.b(4) – The stream buffer mitigation area replacement at a minimum ratio of 1:1 pursuant to KZC 90.65 is met.
		Staff Comment/Analysis: Since use of a mitigation bank is the proposed method of mitigation for impacts within the City of Kirkland, watering plans are not applicable for this project.
\boxtimes		KZC 90.145.6.b(5) – Proposed erosion control measures comply with the City's Public Works Pre-Approved Plans: <u>Staff Comment/Analysis:</u> A TESC plan should be submitted with the land surface modification permit and should include any applicable
\boxtimes		KZC 90.145.6.b(6) – Mitigation is consistent with other requirements in this code, including sight distance requirements at intersection pursuant to Chapter 115 KZC.
		requirements in the Kirkland Zoning Code.
		 KZC 90.145.6.b(7) – All planted areas of the mitigation project have a temporary, above ground sprinkler system set to automatic timers. Temporary sprinkler systems shall be removed in the final year of monitoring once vegetation is well established. When public or private water is not available, a plan for reliable watering by truck or hand shall be included. <u>Staff Comment/Analysis:</u> Since use of a mitigation bank is the proposed method of mitigation for impacts within the City of Kirkland, watering plans are not applicable for this project.

Complies as proposed	Not Applicable	Complies as conditioned	CODE SECTION
	Wetland Compensatory Mitigation		
	\boxtimes		KZC 90.150.2 – Table 90.150.1 establishes mitigation ratios for wetlands and wetland buffers. The minimum mitigation ratio for permanent wetland impact is 12:1. The minimum mitigation ratio for wetland buffer alteration is 1:1.

	<u>Staff Comment/Analysis:</u> Since use of a mitigation bank is the proposed method of mitigation for impacts within the City of Kirkland, mitigation ratios and information about other compensatory mitigation requirements are not applicable for this project.
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- b. <u>Conclusion:</u> Based on the mitigation sequencing analysis above, and the review by The Watershed Company of the project plans, mitigation plan, and monitoring and maintenance plans; the proposal is consistent with the mitigation sequencing and general mitigation requirements of KZC 90.145 and wetland compensatory mitigation requirements of 90.150, subject to the following conditions:
 - (1) The applicant should implement the approved mitigation plan pursuant to the standards in KZC 90.145 along with the recommendations of the City's consulting qualified critical area professional found in Attachments 11 and 12.
 - (2) The applicant should implement and comply with the approved monitoring and maintenance plan in Attachment 11 with the recommendations of the City's consulting qualified critical area professional found in Attachment 12 and submit a monitoring report to the Planning Official at required scheduled intervals.

4. TREE MANAGEMENT (KZC 95)

- a. <u>Facts:</u>
 - (1) KZC 95.30 requires any proposed development subject to a land surface modification permit or Process IIA review to submit a tree retention plan for review.
 - (2) The applicant submitted an arborist report dated January 29, 2020 (see Attachment 14) and a tree restoration plan dated February 2020 (see Attachment 15).
 - (3) The applicant's arborist report identified 292 trees for removal within the portion of the corridor located in Kirkland, WA. PSE will mitigate for the trees' removal through different means depending on the location of each tree. The arborist report describes mitigation standards for five different tree locations. The locations and mitigation standards include:
 - (a) <u>Private Property:</u> Trees removed on private property will be replaced on-site with transmission compatible trees.
 - (b) <u>Right-of-Way Trees:</u> Trees located within developed rights-of-way will be replaced in-place per the tree replacement detail (see Attachment 15).
 - (c) <u>Cross Kirkland Corridor (CKC)</u>: For tree removal located within the CKC, PSE will pay an agreed upon fee to the City of Kirkland and the City of Kirkland will replant the trees at a City selected location.
 - (d) <u>Mitigation Bank:</u> For trees located on private property located within critical areas or buffers, PSE will mitigate for tree removal through purchasing credits at an approved mitigation bank in compliance with the KZC as outlined in the Critical Areas Impact Assessment (see Attachment 11).
 - (e) <u>WSDOT Mitigation</u>: Tree replacement within the WSDOT

ROW will be reviewed by WSDOT under the State Utility Permit.

- b. <u>Conclusions:</u>
 - (1) Trees shall not be removed or altered following approval except as approved by the Planning Department.
 - (2) The applicant will submit a signed agreement with the City detailing the fee in lieu of supplemental tree plantings for tree removal within the Cross Kirkland Corridor.

5. GENERAL ZONING CODE CRITERIA

- a. <u>Fact</u>: Zoning Code section 150.65.3 states that a Process IIA application may be approved if:
 - (1) It is consistent with all applicable development regulations and, to the extent there is no applicable development regulation, the Comprehensive Plan; and
 - (2) It is consistent with the public health, safety, and welfare.
- b. <u>Conclusion</u>: The proposal complies with the criteria in section 150.65.3. It is consistent with all applicable development regulations (see Sections II.A-E) and the Comprehensive Plan (see Section II.F). In addition, it is consistent with the public health, safety, and welfare.

F. COMPREHENSIVE PLAN

- 1. <u>Fact</u>: The subject property is located within the Totem Lake and Juanita neighborhoods and must be consistent with relevant Comprehensive Plan policies. Below are the applicable policies for the proposal found in various chapters of the Comprehensive Plan followed by staff response.
 - a. **Utilities Chapter, Policy U-1.4**: Ensure that utility services are provided in a manner that is environmentally sensitive, safe, and aesthetically compatible with surrounding land uses.

<u>Staff Response:</u> PSE has demonstrated compliance with the City's mitigation sequencing standards (see Section II.E.3) and provided a siting and design analysis addressing strategies used to minimize impacts to City views (see Attachment 6).

b. Utilities Chapter, Policy U-1.6: Promote renewable energy.

<u>Staff Response:</u> PSE promotes renewable energy through the Puget Sound Energy Green Power program which ensures that a portion of Kirkland's municipal electricity is matched with clean renewable energy resources located in the Northwest.

c. **Utilities Chapter, Policy U-1.8**: Install new and, where feasible, existing utility distribution lines underground.

<u>Staff Response:</u> Designing an underground transmission line for this project was not feasible due to engineering and permitting constraints. It would also limit the project's ability to comply with the Comprehensive Plan's Utilities Chapter, Policy U-1.9 which encourages joint use of utility facilities, as PSE does not have the authority to require vendors sharing PSE's utility poles to move their infrastructure underground.

d. Utilities Chapter, Policy U-1.9: Encourage the joint use of utility

corridors and facilities.

<u>Staff Response:</u> PSE allows for joint use of their power poles by permitting telecommunication providers and other utility providers to install their equipment along PSE's poles.

e. **Utilities Chapter, Policy U-1.10**: Coordinate with other jurisdictions and tribes when utility additions and improvements cross jurisdictional boundaries to ensure that decisions are consistent with regional demand and resources and consistency in timing of permit review.

<u>Staff Response:</u> PSE worked with surrounding municipalities and jurisdictional bodies in the sighting and design of this project due to its regional impacts and location within the City of Kirkland, unincorporated King County, and City of Redmond.

2. <u>Conclusion</u>: The proposal with staff recommended conditions is consistent with the policies of the relevant Chapters of the Comprehensive Plan.

G. DEVELOPMENT STANDARDS

- 1. <u>Fact</u>: Additional comments and requirements placed on the project are found on the Development Standards, Attachment 3.
- 2. <u>Conclusion</u>: The applicant should follow the requirements set forth in Attachment 3.

III. SUBSEQUENT MODIFICATIONS

Modifications to the approval may be requested and reviewed pursuant to the applicable modification procedures and criteria in effect at the time of the requested modification.

IV. APPEALS AND JUDICIAL REVIEW

The following is a summary of the deadlines and procedures for appeals. Any person wishing to file or respond to an appeal should contact the Planning Department for further procedural information.

A. APPEALS

Appeal to City Council: Section 150.80 of the Zoning Code allows the Hearing Examiner's decision to be appealed by the applicant and any person who submitted written or oral testimony or comments to the Hearing Examiner. A party who signed a petition may not appeal unless such party also submitted independent written comments or information. The appeal must be in writing and must be delivered, along with any fees ordinance. the Planning Department bv 5:00 p.m. set by to , twenty-one (21) calendar days following the postmarked date of distribution of the Hearing Examiner's decision on the application.

B. JUDICIAL REVIEW

Section 150.130 of the Zoning Code allows the action of the City in granting or denying this zoning permit to be reviewed in King County Superior Court. The petition for review must be filed within 21 calendar days of the issuance of the final land use decision by the City.

V. LAPSE OF APPROVAL

Pursuant to KZC 150.135, the applicant must begin construction or submit to the City a complete building permit application for the development activity, use of land or other actions

approved under this chapter within five (5) years after the final approval of the City of Kirkland on the matter, or the decision becomes void; provided, however, that in the event judicial review is initiated per KZC 145.110, the running of the five (5) years is tolled for any period of time during which a court order in said judicial review proceeding prohibits the required development activity, use of land, or other actions.

The applicant must substantially complete construction for the development activity, use of land, or other actions approved under this chapter and complete the applicable conditions listed on the notice of decision within seven (7) years after the final approval on the matter, or the decision becomes void.

VI. <u>APPENDICES</u>

Attachments 1 through 15 are attached.

- 1. Vicinity Map
- 2. Plan Set
- 3. Development Standards
- 4. Public Comment
- 5. SEPA DNS
- 6. PSE Siting Analysis
- 7. AECOM Wetland Delineation Report Oct 2019
- 8. TWC Delineation and Mitigation Review Sep 2020
- 9. AECOM Wetland Delineation Report FINAL Feb 2021
- 10. Critical Area Map
- 11. AECOM Transmission Line Impact Assessment Feb 2021
- 12. AECOM Wetland Mitigation Bank Plan
- 13. TWC Mitigation Approval
- 14. Arborist Report
- 15. Tree Restoration Plan

VII. PARTIES OF RECORD

Applicant Kerry Kriner with Puget Sound Energy Planning and Building Department Department of Public Works

A written decision will be issued by the Hearing Examiner within eight calendar days of the date of the open record hearing.

Review by Planning Director:						
I concur X I do not concur						
omments:						

9/17/21____ Adam Weinstein, Director Date

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Background: ESRI World Imagery Data Sources: City of Kirkland, King County GIS, DEA.

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1 inch = 80 feet

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DAVID EVANS

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DAVID EVANS



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ATTACHMENT S ZONZO-00104

DEVELOPMENT STANDARDS ZON20-00104



EULDING DEPARTMENT

The scope of work as described is not within the scope of either Building Code nor the Electrical Code (by exteption) and as such no permits will be required.

PUBLIC WIDRES DEPARTMENT

PUBLIC WORKS CONDITIONS Permit #: ZON20-00104 Project Name: PSE Transmission Unix. Restmond to Juanita Project Address: Sammamish Substation in Retimond at 9211 Willows Road NE Date: Joby 5, 2020

Public Works Staff Contacts

Tuan Phan, Development Engineering Supervisor Pitone: 425-587-3843 / E-mail: tonun@kirklandwa.gov.

General Contlitions:

 All City of Kirkland maintained public improvements associated with this project including sheet and ubility improvements, must meet the City of Kirkland Public Works Pre-Approved Plans and Policies Manual - A Public Works Pre-Approved Plans and Policies manual can be purchased from the Public Works Department, or it may be retrieved from the Public Works Department's page at the City of Wrisland's web site.

2. The project Will require a Franchise Utility Right-of-Way permit from Public Works

 Land modification activity not in the right-of-way (ag. parcel development) may require a Land Surface Modification (LSM) Permit; to be determined based on scope of work.

 This project will be subject to Public Works Permit Fees. It is the applicant's responsibility to contact the Public Works. Department to determine the fees. Fees will include the following (but may not be limited to):

a Right of Way (PUB) Permit Fee

a Beview and inspection Fee (public improvements and restoration)

 All civil engineering plans which are submitted in conjunction with a building, grading, or right of way permit must conform to the Public Works Policy & 7, Engineering Plan Requirements. This pulicy is contained in the Public Works Pre-Approved Plans and Policies manual.

 Street and utility improvements to be maintained by the City of Kirkland shall be designed and stamped by a Washington-State Licensed Engineer.

7. All place submitted must have elevations which are based on the King County datum only (NAVD 88).

8. A completewass sheek reading is required prior to submittal of any permit applications.

9. The required tiss plan shall include any significant tree in the public right-ol-way.

10. The required Traffic Control Plan shall be in accordance with Kinkland standards and the latest publication of the

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ZON20-00104

Page 2 of 3

MUTCD. Review and approval required by the Transportation Engineer, Iris Cabrera.

11. Olympic Pipe Line: See KZC 118.40 for full code language:

 The applicant shall show the hazardous pipeline corridor and applicable setbacks on site plans, subdivisions and short subdivisions for proposed development.

The applicant shall provide verification that the pipeline operator has received and reviewed the development notice
required in section K2C 115.52.030. All comments provided by the operator shall be submitted or the operator shall confirm
in writing that the operator has no comments.

No landfilling or excavation and no construction or expansion of structures is allowed within the corridor other than
those authorized by the pipeline operator. All development activity, landfilling, excavation and construction shall be
setback a minimum of 25 feet from the edge of the corridor. However, streets, utilities, trails and similar uses shall be
exempt from the setback and construction requirements above, provided that the pipeline operator shall be notified prior to
landfilling, excavation or construction.

Surface Water Conditions:

 Provide temporary (construction) surface water control in accordance with the 2016 King County Surface Water Design Manual (KCSWDM) and the City of Kirkland Addendum (Policy D-10).

 If working within an existing ditch, the applicant is hereby given notice that the Army Corps of Engineers (COE) has asserted jurisdiction over upland ditches draining to streams. Either an existing Nationwide COE permit or an Individual COE permit may be necessary for work within ditches, depending on the project activities.

Applicants should obtain the applicable COE permit; information about COE permits can be found at: U.S. Army Corps of Engineers, Seattle District Regulatory Branch

http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits.aspx

Specific questions can be directed to: Seattle District, Corps of Engineers, Regulatory Branch, CENWS-OD-RG, Post Office Box 3755, Seattle, WA 98124-3755, Phone: (206) 764-3495

3. Construction Stormwater Pollution Prevention Plan (CSWPPP):

All proposed projects that will conduct construction activities onsite, or offsite must provide stormwater pollution
prevention and spill controls to prevent, reduce, or eliminate the discharge of pollutants (including sediment) to onsite or
adjacent stormwater systems or watercourses.

Refer to Core Requirement No. 5 in the KC5WDM and Policy D-12.

 Provide an erosion control report and plan with the Building or Land Surface Modification Permit application. The plan shall be in accordance with the KCSWDM.

Construction drainage control shall be maintained by the developer and will be subject to periodic inspections. During
the period from May 1 and September 30, all denuded soils must be covered within 7 days; between October 1 and April 30,
all denuded soils must be covered within 12 hours. Additional erosion control measures may be required based on site and
weather conditions. Exposed soils shall be stabilized at the end of the workday prior to a weekend, holiday, or predicted
rain event.

4. If the project site is one acre or greater, the following conditions apply:

The applicant is responsible to apply for a Construction Stormwater General Permit from Washington State Department
of Ecology. Provide the City with a copy of the Notice of Intent for the permit. Permit Information can be found at the
following website: http://www.ecy.wa.gov/programs/wq/stormwater/construction/

 Among other requirements, this permit requires the applicant to prepare a Storm Water Pollution Prevention Plan (SWPPP) and identify a Certified Erosion and Sediment Control Lead (CESCL) prior to the start of construction. The CESCL shall attend the City of Kirkland PW Dept. pre-construction meeting with a completed SWPPP.

Turbidity monitoring by the developer/contractor is required for any surface water leaving the site.

 A Stormwater Pollution Prevention and Spill (SWPPS) Plan must be kept on site during all phases of construction and shall address construction-related pollution generating activities. Follow the guidelines in the Ecology Pollution Prevention Manual for plan preparation. ZON20-00104 Page 3 of 3

Street and Right-of-Way Restoration Conditions:

1. Protect trees in the right-of-way that are identified as significant or viable, unless approved for removal by the Planning and Public Works Departments.

 Restore all public improvements and surfaces to its pre-construction condition or better. Refer to Kirkland's Pre-Approved Plans and Notes for specifications.

3. Street cuts may trigger street overlay requirements per Public Works Policy R-7.

- 4. A portion of this project will traverse through the Cross Kirkland Corridor (CKC). The following conditions apply:
- A. PSE shall work with the City to not obstruct the current trail or planned future improvements.
- B. Show any easements granted to PSE across the CKC for which the transmission alignment is proposed.

C. Continue to coordinate with the Eastside Rail Corridor Easement Holders. Keep the City of Kirkland current on all plans and proposals.

D. Provide public outreach: construction schedule, trail usage impacts, and closures. Coordinate with Kirkland public outreach staff.

Meet the requirements of the Kirkland Intersection Sight Distance Policy R.13. All street and driveway intersections shall not have any visual obstructions within the sight distance triangle.

It shall be the responsibility of the applicant to relocate any above-ground or below-ground utilities which conflict with the project, associated street, or utility improvements.

Coordination with Private Development Projects along NE 124th St:

Primary Contact: Ryan Schauble, Development Engineer

Phone: 425-587-3842 / E-mail: RSchauble@kirklandwa.gov

1. ARCO AM/PM at NE 124th St and 116th Ave

 Proctor Willows residential development at NE 124th St and Willows Road. This project is technically in Redmond, however it is adjacent to Kirkland ROW (NE 124th St).

Coordination with Kirkland Capital Projects:

Primary Contact: Aaron McDonald, Senior Project Engineer (Capital Projects Division) Phone: 425-587-3837 / E-mail: AMcDonald@kirklandwa.gov

1. Totem Lake Connector project. (Aaron McDonald)

- 2. 124th St/116th Ave. Intersection Improvements. (Catherine Okamura)
- 3. 124th Ave Widening project. (Aparna Khanal)



Sammamish –Juanita 115 kV Transmission Line Project Comment Responses 9/25/20

Anthony and Kristin Jonas 12804 109th Avenue NE

Comment: The transmission lines border our property on two sides (both the East and South side) so we are highly impacted by any work made to these lines. We have a few requests we would like the city/PSE to consider if this permit is to be approved.

1. If the poles are to be replaced in this residential neighborhood, that they are replaced with poles in the same location and the old poles are completely removed.

PSE Response: The poles along the south side of NE 128th Street will be replaced in generally the same location. As a first step, PSE will install new (replacement) poles adjacent to existing poles. PSE will then install new (replacement) transmission wire on the new poles and transfer our existing underbuilt distribution wire to the new poles. Next, the communications companies will transfer their respective wires to the new poles. Finally, PSE will remove the old poles and restore disturbed areas.

2. If the poles are to be replaced, they be replaced with solid wood poles (as is currently used in this location), not the more industrial-looking metal poles which would not fit with the character of the neighborhood.

PSE Response: PSE's project design uses wood replacement poles for the three poles located on the south side of NE 128th Avenue NE.

3. There is a rats nest of telephone, cable, and lower voltage wires hung on the lower elevations of these poles. Please see attached photos for what the lines already look like that encircle our property. These lines should have been undergrounded when Juanita High School was replaced, but it seems the city granted LWSD a waiver from that undergrounding requirement. When this work is completed on these same poles, all of these lower lines should be underground in the Juanita residential neighborhood. Being that we are so close to the Juanita substation, there are much higher numbers of lines overhead compared to a typical residential neighborhood. When new lines are placed in the city, the city requires that they be buried. We understand that this is

not possible for the higher-voltage lines, but the city should require that PSE underground these data and lower voltage lines in exchange for running these new higher-voltage transmission lines being run through the community.



PSE response:

The existing transmission poles support both PSE transmission lines and distribution lines, as well as other providers' communication lines (including cable and telephone). When PSE replaces existing poles, there is no City code requirement to underground existing lines. PSE's state tariff governs undergrounding of PSE distribution lines and requires cost sharing on the part of the entity requesting the undergrounding. The City has not requested such undergrounding and, subsequently, PSE has no authority to require communication companies to underground their lines.

Adam Rosen

12335 120th Avenue NE

Comment: We read the recently published report on Code Compliance and Siting and Design Analysis for the proposed transmission line. Section 2C of the report recommends not routing the line along NE 132nd Street due to the proximity of residences and schools, yet the proposed path for the transmission line is in very close proximity to our site where we are planning a 400+ unit apartment complex and out adjacent neighbor's site at 12233 116th Ave NE where there is a Montessori pre-school. The TL zoning encourages dense residential and commercial uses in this corridor and it seems that the report does not take pending developments and future uses encouraged by the zoning into adequate consideration. It is our understanding that the line could cross the I-405 freeway at NE 124th Street instead of NE 116th Street to avoid residential neighborhoods entirely and satisfy the recommendations of the report.

PSE Response:

The Code Compliance and Siting and Design Analysis provides a high-level overview and summary of PSE's transmission line siting process, as well as documenting compliance with the decision criteria in the City of Kirkland code for Electrical Transmission Lines. The report does not address every property within the vicinity of the project individually.

The presence of schools and residences along 132nd Avenue NE were community values discussed with the SAG during the siting process, but they were not the reason the transmission line was not ultimately sited along 132nd Avenue NE. There were several areas along 132nd Avenue NE that presented engineering and constructability challenges, which resulted in PSE ruling out the 132nd Avenue NE alternative.

As part of the siting process, PSE engaged with WSDOT and the City of Kirkland to evaluate options for crossing I-405. PSE must obtain a permit from the WSDOT to cross state highways including I-405, so it was necessary for PSE to coordinate with WSDOT to establish a crossing that met WSDOT requirements. WSDOT was in the process of siting their Good to Go infrastructure at or near potential crossing points. It was also necessary to receive input from the City of Kirkland to ensure the crossing would be compatible with future City projects and development in the area.

Potential crossing options included NE 118th Street (current location), NE 124th Street, NE 128th Street, and NE 132nd Street. Ultimately, NE 118th Street was selected as the crossing that would not cause potential conflicts with proposed WSDOT and City improvements and met PSE's engineering standards. Factors such as engineering, constructability, ability to acquire easement rights, and compatibility with existing and planned infrastructure impact PSE's ability to permit the necessary electric infrastructure. In this case, the NE 118th Street crossing is the option WSDOT has agreed to permit. This crossing location also has the benefit of being the least impactful on property owners, as PSE has existing rights to site the line within the Cross Kirkland Corridor (CKC) and this corridor avoids crossing private property to reach I-405.

PSE's permit applications under review by the City of Kirkland comply with current comprehensive plan policies and zoning standards. The regulations ask that PSE consider, minimize, and mitigate impacts to the extent technically feasible to schools and residential areas, and PSE meets this decision criterion as demonstrated through the application materials. The proposed transmission line will not impact Mr. Rosen's ability to develop his property, as the transmission line will be located on the east side of 120th Avenue NE and Mr. Rosen's property is located on the west side of 120th Avenue NE.

Alan Nelson

Northshore Utility District

The District has been in ongoing discussions with King County Wastewater Treatment Division (KCWTD) to serve the anticipated growth by diverting sewage flows easterly along the CKC to KCWTD's York Pump Station facility located at NE 124th St and Willows Rd. This route would alleviate the need to construct an additional line under Interstate 405, which is a high-risk costly venture. The alternate easterly route, along the CKC, provides a low risk gravity sewer option. King County is currently reviewing this proposal.

The proposed high voltage transmission project could pose a significant impact to the District's ability to provide long-term sewer service to the Totem Lake area which is of significant concern. If PSE's plans include placing additional high voltage transmission main facilities within the CKC then it could

jeopardize the ability for the installation of a new sewer main and prevent the District from being able to serve planned growth in the Totem Lake area.

The District requests that PSE's proposal be designed to accommodate the installation of a future public sewer main within the CKC. If this is not feasible, then the District respectfully requests the City deny expanded use of the CKC by PSE so that future public sewer service could be provided.

PSE Response:

PSE acquired easement rights in the Cross Kirkland Corridor (CKC) in 2011 from the Port of Seattle, and is relying on those rights to construct the proposed 115 KV transmission line. PSE and King County have been coordinating on this project since 2013 to ensure the compatibility of the proposed transmission line with King County's easements and underground facilities. At present, the Northshore Utility District does not have any operating rights in the CKC, and any future rights would be subordinate to the rights of the current easement holders (PSE, King County, and others). It is inappropriate to deny or condition PSE's permit based on future, speculative decisions and property interests including the potential for the Northshore Utility District to pursue rights in the corridor.



CITY OF KIRKLAND Planning & Building Department 123 5th Avenue, Kirkland, WA 98033 425.587.3600 ~ www.kirklandwa.gov

MEMORANDUM

To: Adam Weinstein, AICP, SEPA Responsible Official

From: Jennifer Anderer, Planner

Date: October 12, 2020

File: SEP20-00106

Subject:STATE ENVIRONMENTAL POLICY ACT (SEPA) DETERMINATION
PSE SAMMAMISH-JUANITA 115kV TRANSMISSION LINE

<u>GENERAL</u>

The applicant, Kerry Kriner with Puget Sound Energy (PSE), has proposed to construct a new 5mile 115kV transmission line spanning three jurisdictions: City of Redmond, unincorporated King County, and the City of Kirkland. PSE is proposing seventy-four new transmission line poles (plus one stub pole) and replacement of 28 existing transmission poles and 2 existing distribution poles between the Sammamish Substation in Redmond, WA and the Juanita Substation in Kirkland, WA. Additionally, in order to provide a bay for the transmission line at the Sammamish Substation, one new pole will be installed, and 6 poles will be replaced south of the substation on PSE property. Substation improvements include the installation of a dead-end tower, a switch, and bus supports to accommodate the new line in and out of the Totem Substation in Kirkland, WA. The Sammamish Substation updates will include new switches and a circuit breaker on new foundations and one pole will be installed and one will be replaced to connect the new line to an existing 115kV bay. The proposed route runs between the Sammamish Substation in Redmond, WA (9221 Willows Road NE) and the Juanita Substation in Kirkland, WA (10910 NE 132nd St) including looping around the Totem Substation in Kirkland, WA (13209 NE 123rd St) as seen on the Vicinity Map (see Attachment 1).

ANALYSIS

The SEPA "threshold determination" is the formal decision as to whether the proposal is likely to cause a significant adverse environmental impact for which mitigation cannot be identified. If it is determined that a proposal may have a significant adverse impact that cannot be mitigated, an Environmental Impact Statement (EIS) would be required.

Many environmental impacts are mitigated by City codes and development regulations. For example, the Kirkland Zoning Code has regulations that protect sensitive areas, limit noise, provide setbacks, establish height limits, etc. Where City regulations have been adopted to address an environmental impact, it is presumed that such regulations are adequate to achieve sufficient mitigation [WAC 197-11-660(1)(e) and (g)].

I have had an opportunity to visit the subject property and review the following documents:

- Environmental Checklist dated February 18, 2020, updated October 23, 2020 (see Attachment 2)
- Full Project Plan Set (see Attachment 3)
- Arborist Report (see Attachment 4)
- Tree Restoration Plan (see Attachment 5)

PSE Sammamish-Juanita 115kV Transmission Line File No. SEP20-00106 Page **2** of **8**

- Cultural Resources Inventory (see Attachment 6)
- Photo Simulations (see Attachment 7)
- Electric and Magnetic Fields (EMF) Analysis (see Attachment 8)
- Code Compliance and Siting and Design Analysis (see Attachment 9)
- SEPA Public Comments and Letters (see Attachment 10)

It will be necessary to further analyze certain aspects of the proposal to determine if the project complies with all the applicable City codes and policies. That analysis is most appropriately addressed in the staff advisory report, which will be presented at the public hearing.

Below is an analysis of key SEPA elements identified by staff and/or brought up by the general public (see Attachment 10).

Streams and Wetlands

The project improvements are located within wetlands, streams, and their associated buffers on the City of Kirkland Critical Areas Map reflected in the full plan set (see Attachment 3). Subject to Kirkland Zoning Code Chapter 90, a critical area report prepared by a qualified critical area professional licensed in Washington State requires peer review by the City or the City's consultant. Prior to the issuance of the grading permit and building permit for the transmission line, a peer review shall be completed under the Sensitive Area Determination process by the Planning Official. Through the analysis of the Sensitive Area Decision under the Public Utility Exception standards, all applicable mitigation and restorative measures will be required in accordance with Kirkland Zoning Code Chapter 90 standards.

Public Comments:

<u>Comment</u>: PSE should provide details regarding the need for this project and consider alternatives to building a new power line especially considering the project results in removal of significant trees.

<u>City Response:</u> Kirkland Zoning Code Chapter 115 Section 107 (KZC 115.107) permits the installation of new electrical transmission lines subject to decisional criteria and a siting and design analysis. As part of this analysis, the project is subject to tree retention standards detailed in KZC 95 that are more appropriately analyzed in the staff advisory report, which will be presented at the public hearing.

<u>PSE Response:</u> PSE understands this commenter's concerns about the removal of trees and has designed the line in a way that seeks to reduce tree removal. Where avoidance cannot be achieved, PSE will fully mitigate for those trees consistent with the City's code.

PSE's decision to move forward with this project is not elective, but rather required for PSE to comply with federal reliability standards. Like all utilities with bulk power infrastructure, PSE is required to adhere to North American Electric Reliability Corporation (NERC) standards designed to protect the reliability of the bulk power system in North America. The NERC standards are in place to ensure the bulk power system is robust enough to maintain system reliability under a variety of different outage scenarios and reduce the potential for large-scale, regional blackouts.

PSE's electric system planners are required to study the PSE electric system on an annual basis to ensure it meets NERC transmission planning standards. In 2009, system planners completed an extensive needs assessment, which identified the need for a new transmission line between Sammamish and Juanita substations (the Sammamish-Juanita 115 kV transmission line project) to ensure NERC requirements continue to be met under a variety of conditions.

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The study showed that peak electric load was growing in the Moorlands System – the electrical system comprised of three existing transmission lines and 12 substations serving portions of Redmond, Kirkland, Bothell, and Woodinville. Large commercial projects in the region were contributing to the demand for energy in the Moorlands area, in addition to a growing residential population. In winter of 2009, PSE saw the largest electric load on record in the area, nearly reaching the electric capacity in the Moorlands system. Due to peak load growth, the Sammamish-Juanita transmission line project was initiated to ensure NERC standards continue to be met.

The need for the project was reaffirmed through annual transmission planning studies. PSE's 2019 planning study showed the potential for system overloads in certain conditions in all seasons – not just during peak energy use seasons such as winter or summer. PSE is also seeing more strain on the electric system outside of traditional peak load hours. Transmission capacity in the area is becoming inadequate to serve customer loads. As a result, taking any of the three existing transmission lines out of service, either for the planned maintenance or for an unexpected outage (like a car-pole accident), compromises PSE's ability to reliably serve load to the 12 substations within the Moorlands System.

Although not required, PSE looked at other alternatives to building a new transmission line; including energy efficiency, converting water heaters and space heating from electric to gas, demand response, solar and batteries. However, these non-wired solutions are not feasible in solving the Moorlands System's large-scale capacity constraints. Customers cannot conserve enough to lower the peak load to the level needed, and batteries and solar options cannot be deployed at the scale required to solve the regional capacity problem in a reliable or cost-efficient way. Additionally, solar production is usually low during the winter – when peak load is typically at its highest.

Building the new Sammamish-Juanita transmission line will allow PSE to continue to serve customers in the area under a variety of system conditions. It will also allow PSE to balance customer electric load across all transmission lines to relieve capacity constraints on the system by adding a fourth transmission line to the Moorlands System and moving two of the 12 substations from the existing system to be served by the new line.

Utilities within the state of Washington are regulated by the Washington State Utilities and Transportation Commission (WUTC). Any infrastructure project that PSE constructs must be determined to be prudent and within the public interest by the WUTC. Legal proceedings are conducted by the WUTC to determine costs recovered by regulated utilities.

<u>Comment</u>: The public outreach process conducted in 2012 using a Stakeholder Advisory Group (SAG) should be updated to reflect the current needs of the public.

<u>City Response:</u> Per KZC 115.108, applications for a new electrical transmission line shall be reviewed pursuant to KZC 150 Process IIA which does not require an applicant to conduct public outreach or the use of a stakeholder advisory group. The Process IIA standards do require a notice of application, a public comment period, and an open public hearing held before the Hearing Examiner. Any additional outreach would be at the applicant's discretion.

<u>PSE Response:</u> Siting a long, linear transmission line in an urban area is a complex and lengthy process. PSE looks at many different factors in determining the route for a new transmission line including engineering constraints, constructability, property rights, compliance with regulations, and community input. Although not a requirement of the City of Kirkland code, PSE chose to form a Stakeholder Advisory Group (SAG) as one means of gathering community input on siting the proposed transmission line. PSE used recommendations from the SAG to incorporate community values into selecting a route; however, the results of the SAG process were not the only considerations in siting the transmission line. PSE provided several opportunities throughout the siting and design process for the public to provide input on the project, including maintaining

PSE Sammamish-Juanita 115kV Transmission Line File No. SEP20-00106 Page **4** of **8**

a project website and responding to public inquiries and comments on the project. Additionally, as the siting and design progressed, PSE monitored changes in City codes and policies and met with City staff on a regular basis. PSE's permit applications under review by the City of Kirkland comply with current comprehensive plan policies and zoning standards.

<u>Comment</u>: The transmission line route should be reconsidered to meet current standards and community needs and cross I-405 in the vicinity of NE 124th Street or NE 128th Street to shorten the length of the line and potentially reduce cost.

<u>PSE Response:</u> As part of the siting process, PSE engaged with the Washington Department of Transportation (WSDOT) and the City of Kirkland (City) to evaluate options for crossing I-405. PSE must obtain a permit from the WSDOT to cross state highways including I-405, so it was necessary for PSE to coordinate with WSDOT to establish a crossing that met WSDOT requirements. WSDOT was in the process of siting their Good to GO infrastructure at or near potential crossing points. It was also necessary to receive input from the City to ensure the crossing would be compatible with future City projects and developments in the area.

Potential crossing options included NE 118th Street (current location), NE 124th Street, NE 128th Street, and NE 132nd Street. Ultimately, NE 118th Street was selected as the crossing that would not cause potential conflicts with proposed WSDOT and City improvements as well as meeting PSE's engineering standards. Factors such as engineering, constructability, ability to acquire easement rights, compatibility with existing and planned infrastructure impact PSE's ability to permit the necessary electric infrastructure. Taking these factors into consideration, there is no evidence that alternative crossings to the proposed would result in less cost. In this case, the NE 118th Street crossing is the option WSDOT has agreed to permit. This crossing location also has the benefit of being the least impactful on property owners, as PSE has existing rights to site the line within the Cross Kirkland Corridor (CKC) and this corridor avoids crossing private property to reach I-405.

Comment: PSE's general statement that the proposed transmission line complies with the City of Kirkland codes including KZC 115.107 which requires an assessment of certain criteria including being consistent with the public health, safety, and welfare, does not properly consider the risk to human health of non-ionizing EMF's (electric and magnetic fields) from high voltage power lines and associated risk of cancer, especially in children.

<u>PSE Response:</u> EMF are present wherever electricity flows – household appliances, computers, printers, cell phones, and power lines. PSE prioritizes the safety of the public and its employees above all else, and the company relies on the findings of reputable international and national scientific and public health organizations and agencies that have reviewed and analyzed the research on EMF. For more than 40 years there have been many scientific studies conducted on power frequency EMF. Extensive reviews and research conducted by leading public health agencies such as the World Health Organization (WHO) and the U.S. National Institute of Environmental Health Sciences (one of the U.S. National Institutes of Health) and they have not established that exposure to power frequency EMF causes adverse health effects in humans or animals. As such, PSE is unaware of any scientific basis for correlating 115kV transmission lines with any adverse human health impact.

PSE follows all applicable federal and state regulations and standards when constructing transmission line facilities for the safe and reliable delivery of electric service. There are currently no State of Washington or federal standards that address exposure limits to electric and magnetic fields. Because electric power line clearance standards for safety from buildings and other objects far exceed any known human or animal exposure limits to EMF, safe EMF exposure is not a consideration in PSE's siting process.

PSE Sammamish-Juanita 115kV Transmission Line File No. SEP20-00106 Page **5** of **8**

To address the specific questions related to EMF levels and related health concerns at Evergreen Academy, PSE has consulted with a third-party EMF expert, Mr. Andrew Thatcher. Mr. Thatcher is a board-certified health physicist and public health professional with over 30 years of experience evaluating both ionizing and non-ionizing radiation exposures. He spent 18 years serving as the non-ionizing radiation expert for the State of Washington and is now an editor of the Health Physics Journal for non-ionizing radiation topics. He was also engaged in the Sammamish-Juanita 115kV line public outreach process, including attendance at community meetings and responding to individual questions. Mr. Thatch's analysis of this comment is compiled in the attached report (see Attachment 8). For more information regarding EMF, PSE provides resources on their website at https://www.pse.com/pages/electromagnetic-fields

Comment: Since PSE's report inadequately covered potential health effects of EMF, particularly related to childhood cancers, the SEPA review should result in an Environmental Impact Statement (EIS) to provide opportunities for public comment, a place for the City and PSE to respond to said comments, and require PSE to explore design alternatives such as relocating the transmission line or placing the line underground as was required by the City of Camas, WA in Chapter 8.52 in the Health and Safety section of their Code of Ordinance.

<u>City Response:</u> An EIS is required for any proposal likely to have a significant adverse environmental impact in which mitigation of the impacts that would reduce them to a nonsignificant level are not already required by a jurisdiction. KZC 115.107.4 and KZC 115.107.5 require analysis and mitigation of impacts that may affect schools or residential areas including investigation into potential technologies and design features that would mitigate visual and environmental impacts. Mitigation analysis is more appropriately analyzed in the staff advisory report, which will be presented at the public hearing. Pursuant to WAC 197-11-330, the lead agency (Kirkland) has assessed PSE's proposal, reviewed the subject matter expert EMF analysis (see below), and made the threshold determination that the project will not have a probable significant adverse environmental impact.

<u>PSE Response:</u> PSE's Code Compliance and Siting and Design Analysis (CCSDA) report is a summary of the project siting process and compliance with applicable City of Kirkland code criteria. PSE chose to provide this analysis; the format and specific content of which is not required by City of Kirkland code. The City is the decision maker on how the project complies with applicable codes and standards and will make a recommendation to the Hearing Examiner for their consideration.

As an electricity provider, PSE follows the science of EMF closely. To that end, PSE regularly consults EMF experts to ensure that the science continues to confirm that there is no correlation between EMF levels associated with transmission lines and cancer, including childhood leukemia. To that end, PSE is attaching a report from Mr. Drew Thatcher which discusses the science on EMF generally and provides an assessment on potential impacts specific to Evergreen Academy (see Attachment 1). Consistent with the latest science, Mr. Thatcher concludes that potential EMF exposures to students at Evergreen Academy are orders of magnitude lower than ICNIRP guidelines. PSE is not aware of any scientific basis for concluding that the proposed 115kV transmission line will adversely affect any resident, business, or employee along the entire corridor, including Evergreen Academy.

The SAG meetings were open to the public and were initially publicized through mailed postcards, print ads, and postings on the project webpage. PSE provided mailed notice to property owners within 500 feet of the routes considered to provide project updates and invite community members to community open houses held on the following dates: December 14, 2011, June 20 2012, June 23, 2012, August 21, 2012, and August 22, 2012. PSE also provided a mailed postcard announcing the preferred final route following the conclusion of the SAG process in September 2012. Other communications tools used in sharing project updates included emails to those who requested to be added to the project email list, information for advisory group members to share

PSE Sammamish-Juanita 115kV Transmission Line File No. SEP20-00106 Page **6** of **8**

with their stakeholders, SAG, and community meeting materials posted to the project website, and media engagement.

In particular, PSE sent mailed notices to two addresses for the Bedford Partnership provided through King County Assessor data. The addresses include: 6534 171st Place, Kenmore, WA 98028 and 12333 120th Place NE, Kirkland, WA 98034. PSE records do not show that any mailings to these addresses were returned.

As the Bedford's noted, if a lead agency (in this case the City of Kirkland) determines that a project has the potential to cause a significant environmental impact, they may require the preparation of an EIS under SEPA. As documented in PSE's application submittal and reinforced through Mr. Thatcher's expert analysis, there is no evidence that PSE's transmission line project will pose any potential significant adverse impact to the environment that cannot be mitigated. Therefore, an EIS is not warranted.

Undergrounding a powerline does not eliminate the presence of EMF. Undergrounding a power line results in an increase in EMF immediately above the power line and a corresponding reduction in EMF with vertical distance away from the line. Simply stated, an underground transmission line is located closer to someone at ground level than an above ground line, as the depth underground is a smaller distance from the person than the height of the wires on a pole. The underground lines, being insulate, can be located closer together thereby causing a reduction in the EMF at the same distance from uninsulated lines. Additionally, undergrounding is not a lowcost alternative to reducing EMF and is not justified for that reason by the World Health Organization (WHO). PSE is not aware of the basis of the City of Camas code nor why it correlates to EMF exposure and the City of Camas' undergrounding provisions are specific to distribution lines, not transmission lines. PSE is subject to state tariffs that require requesting parties to pay the cost differential if the request to construct a transmission facility in a different manner than PDE's proposal.

<u>**Comment:**</u> The 2012 SAG eliminated some routes "because of their location in residential neighborhoods and near schools." It seems that they did not consider that the Evergreen Academy, a Montessori school located at 12345 120th Ave NE when proposing the location of the transmission line which runs along 120th Ave NE. The location of the school should receive the same recognition regarding transmission line routing as the schools along 132nd Avenue NE.

<u>City Response:</u> Kirkland Zoning Code Chapter 115 Section 107 (KZC 115.107) permits the installation of new electrical transmission lines subject to decisional criteria and a siting and design analysis. Per KZC 115.107.4, the project is subject to decisional criteria requiring the applicant to site and design the project to minimize and mitigate impacts to schools and residential areas. This analysis is more appropriately analyzed in the staff advisory report, which will be presented at the public hearing.

<u>PSE Response:</u> PSE was aware of the Montessori school located at 12345 120th Avenue NE during the SAG siting process. While schools were one factor discussed during the siting process, the presence of schools was not the reason the transmission line was not ultimately sited along 132nd Avenue NE. Several areas along 132nd Avenue NE presented engineering and constructability challenges, which resulted in PSE ruling out the 132nd Ave NE alternative. The SAG asked PSE to consider avoidance of schools during the siting process but did not specify a desired proximity away from the schools in their request. The Kirkland Zoning Code also requires consideration of minimizing impacts to schools in the decision criterial for Electrical Transmission Lines. Impacts to schools is a subjective criterion, as there are no known health or safety implications for siting a transmission line near a school. Many factors were balanced in siting the linear transmission line in an urban area to ensure the proposal included a feasible route considering engineering, constructability, and regulatory factors. The proposed transmission line is not located on or along the frontage of the Montessori School property. The line will be located on the east side of 120th

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Ave Ne. Consistent with PSE's preferred alternative, PSE has avoided impacts to the extent practicable and the proposed 115kV line fully complies with the City's decision criteria.

<u>Comment</u>: PSE states that to the extent feasible, standard wood transmission poles will be used, but the photo simulations only show galvanized or corten steel poles.

<u>PSE Response</u>: The photo simulation viewpoint locations for the proposed project were chosen by staff at the Cities of Kirkland and Redmond and were not selected based upon pole material. Generally, each photo simulation includes more than one pole simulation. There are 7 photo simulation viewpoints within the City of Kirkland as demonstrated in the simulations on file with the City of Kirkland (see Attachment 7).

- Viewpoint 5: In Viewpoint 5, two poles are included in the simulation. The pole in the foreground is wood and the pole further east is steel (shown as both corten and galvanized).
- Viewpoints 6 and 10: Viewpoints 6 (one pole) and 10 (5 poles) only show wood poles.
- Viewpoint 7: Viewpoint 7, one pole is represented as coten and galvanized steel (the pole in front of the lattice tower).
- Viewpoint 8: Viewpoint 8 shows three new poles, two wood and one steel (the one shown in the island near Rite Aid). This simulation also represents the City's future pedestrian bridge.
- Viewpoint 9: Viewpoint 9 show one wood pole in the foreground and a steel pole further north (shown as corten and galvanized).
- Viewpoint 11: And finally, Viewpoint 11 shows five poles, with 4 wood and the furthest west as steel (both corten and galvanized).

The current project design within the City of Kirkland includes 58 poles. Of those, 13 are proposed to be steel. The number of steel poles may change as the design is further refined based on soil conditions but is not anticipated to significantly increase.

Comment: Concerns were raised regarding the critical area classifications, particularly for Stream K-6, Stream K-5, a tributary to Wetland K-L, and Juanita Creek found in The PSE Sammamish Juanita Transmission Line Critical Area Report by AESOM and mitigations standards including mitigation as it relates to the Cross Kirkland Corridor Master Trail Plan.

<u>City Response:</u> Kirkland Zoning Code Chapter 90 regulates critical area determinations and associated mitigation standards. City analysis of these standards are more appropriately analyzed in the staff advisory report, which will be presented at the public hearing.

CONCLUSION

Based on my review of all available information and adopted policies of the City, I have not identified any significant adverse environmental impacts. Therefore, I recommend that a Determination of Non-Significance be issued for this proposed action.

ATTACHMENTS

- 1. Vicinity Map
- 2. Environmental Checklist dated February 18, 2020
- 3. Full Project Plan Set
- 4. Arborist Report
- 5. Tree Restoration Plan

PSE Sammamish-Juanita 115kV Transmission Line File No. SEP20-00106 Page 8 of 8

- 6. Cultural Resources Inventory
- 7. Photo Simulations
- 8. Electric and Magnetic Fields (EMF) Analysis
 9. Code Compliance and Siting and Design Analysis

10. SEPA Public Comments and Letters

 \boxtimes I concur \square I do not concur

Comments:

1<u>1/5/20</u>

Adam Weinstein, Planning & Building Director Date

applicant CC:



Sammamish-Juanita 115 kV transmission line



ATTACHMENT 1 SEP20-00106 - Vicinity Map

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. <u>You may use "not applicable" or</u> <u>"does not apply" only when you can explain why it does not apply and not when the answer is unknown</u>. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to <u>all parts of your proposal</u>, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the <u>SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D)</u>. Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [HELP]

1. Name of proposed project, if applicable:

Sammamish-Juanita 115kV Transmission Line

2. Name of applicant:

Puget Sound Energy

3. Address and phone number of applicant and contact person:

Puget Sound Energy Kerry Kriner, Senior Land Planner PO Box 97034, EST 4W Bellevue, WA 98009-9734 425-462-3821 kerry.kriner@pse.com

4. Date checklist prepared:

February 2020

5. Agency requesting checklist:

City of Kirkland (Lead Agency) City of Redmond

6. Proposed timing or schedule (including phasing, if applicable):

Construction is anticipated to begin in early 2021 after all permits are secured. Construction will likely commence in the City of Redmond and move into the City of Kirkland in late 2021 or early 2022. Culvert replacement will adhere to appropriate fish windows for construction.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

There are no plans for future additions, expansion, or further activity related to this transmission line project.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

- Puget Sound Energy Sammamish-Juanita Transmission Line Project Wetland Delineation and Stream Reconnaissance Report (AECOM, February 2020)
- Puget Sound Energy Sammamish Substation Wetland Delineation and Stream Reconnaissance Report (AECOM, February 2016)
- Sammamish Substation Property Wetland Boundary Verification (AECOM, June 2019)
- Puget Sound Energy Sammamish-Juanita Transmission Line Critical Area Impact Assessment: Final (AECOM, February 2020)

- Puget Sound Energy Sammamish-Juanita Transmission Line Wetland Bank Use Plan (AECOM, February 2020)
- Conceptual Mitigation Plan, Sammamish-Juanita Transmission Line Project (HDR, January 2020)
- Revised Geotechnical Engineering Report, Sammamish-Juanita Transmission Line (Kleinfelder, January 2020)
- Cultural Resources Inventory for the Sammamish to Juanita 115 kV Transmission Line Project, King County, WA (HRA, February 2020)
- Limited Geotechnical Assessment, Sammamish Substation Site Transmission Corridor (GeoEngineers, January 2020)
- City of Redmond Arborist Assessment (PSE, January 2020)
- City of Kirkland Arborist Assessment (PSE, January 2020)
- King County Arborist Assessment (PSE, January 2020)
- Tree Restoration Plan: NE 124th Street (DEA, February 2020)
- Sammamish-Juanita 115 kV Transmission Line and Access Road: Draft Culvert Basis of Design Memorandum (Otak, January 2020)
- Sammamish-Juanita 115 kV Transmission Line and Access Road: Draft Culvert Monitoring Plan (Otak, December 2019)
- Sammamish-Juanita 115 kV Transmission Line and Access Road: Preliminary Stormwater Report: 60% Design Submittal (Otak, February 2020)

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

The City of Kirkland is in the process of obtaining permits to construct a non-motorized bridge along the Cross Kirkland Corridor (CKC) trail near the intersection of NE 124th Street/124th Street NE and Totem Lake Boulevard. PSE has been coordinating designs with the City regarding that project for several years. The City of Redmond has future plans to construct Phase 3 of the Redmond Central Connector within their fee owned property east of Willows Road NE where the transmission line will be located.

10. List any government approvals or permits that will be needed for your proposal, if known.

- City of Redmond
 - o Conditional Use Permit
 - o Site Plan Entitlement
 - o Coordinated Civil Construction Permit
 - o Transmission Line easement
- City of Kirkland
 - o Process IIA
 - SEPA Threshold Determination
 - Public Utility Exception

- o Land Disturbance Modification Permit
- o Street Use Permit
- King County
 - o Clearing and Grading Permit
- United States Army Corps of Engineers (USACE)
 - o Nationwide Permit
- Washington Department of Fish and Wildlife
 - Hydraulic Project Approval (HPA)
- Washington Department of Ecology
 - Construction Stormwater Coverage

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Puget Sound Energy (PSE) is proposing to construct a new 115kV approximately 5 mile transmission line between Sammamish Substation in Redmond (9221 Willows Road NE, parcel #0325059002) and Juanita Substation in Kirkland (10910 NE 132nd Street, parcel #2926059007) to support the growing energy needs of local growth by increasing system capacity and reliability. The project spans three jurisdictions: City of Redmond, unincorporated King County, and City of Kirkland. Seventy-four (74) new transmission line poles (plus one stub pole) will be installed and 28 existing transmission poles and 2 existing distribution poles will be replaced between Sammamish and Juanita Substations. The transmission line project includes a loop through Totem Substation in Kirkland. Totem Substation improvements include the installation of a deadend tower, a switch, and bus supports to accommodate the new line in and out of the substation. Additionally, in order to provide a bay for the transmission line at Sammamish Substation, one new pole will be installed and 6 poles will be replaced south of the substation on PSE property in order to switch line bay locations for some existing transmission lines. Within Sammamish Substation, new switches and a circuit breaker will be installed on new foundations and one pole will be installed and one will be replaced to connect the new line to an existing 115 kV bay. Within the City of Redmond and unincorporated King County, PSE will install a 1.6 mile (1.36 miles in the City of Redmond and 0.24 miles in unincorporated King County) construction and maintenance access road east of Willows Road NE by widening the former rail corridor ballast due to lack of existing safe access and staging for construction. The existing ballast will be graded and widened to 17 feet to accommodate PSE construction vehicles and equipment. In order to widen the ballast, 7 existing culverts will be replaced, 4 of which will be constructed to DFW fish passage standards. Of the 7 replacement culverts, 3 fish passage and two stormwater will be located within the City of Redmond and one fish passage and one stormwater will be located within unincorporated King County.

Pole Summary Table

Jurisdiction	New Transmission Line (linear miles)	Replacement Transmission Line (linear miles)	# of New Poles	# of Replacement Poles
City of Redmond	1.68	0.08	30	10
Unincorporated King County	0.24	0	5	0
City of Kirkland	2.33	0.79	40 (plus one guy stub pole)	17 (plus two distribution)
Total	4.25 miles	0.87 miles	75	27
	5.12 miles			

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The proposed transmission line will be constructed between PSE's Sammamish Substation in Redmond (9221 Willows Road NE, parcel #0325059002) and Juanita Substation in Kirkland (a10910 NE 132nd Street, parcel #2926059007) and will include a loop through Totem Substation in Kirkland (13209 NE 123rd Street, parcel #2726059084).

City of Redmond

The project will extend northeast from the Sammamish Substation across Willows Road NE and north on easement within City of Redmond owned parcels #0325059019, 346059023, and 2726059140. Additionally, after the corridor enters the City of Kirkland, PSE will be replacing two H-frames on the south side of NE 124th Street in the City of Redmond (parcel #27260590239). The corridor also crosses back into the City of Redmond along the city limits on parcel #2726059041 when the transmission line loops through Totem Substation.

Unincorporated King County

North of parcel #2726059140, the project will enter unincorporated King County, within City of Redmond owned parcel #2726059145 and continue north to NE 124th Street for a distance of approximately 0.24 miles.

City of Kirkland

Just north of the unincorporated King County limits, the entrance to the access road is proposed to extend in NE 124th Street right-of-way under the jurisdiction of the City of Kirkland. The project then turns west along the north side of NE 124th Street and interconnects with an existing transmission line west of the existing north/south Beverly – Renton transmission line corridor. The existing east/west transmission line corridor continues west and heads south across NE 124th
Street and then on easement to Totem Substation. The poles within the easement will be located within the jurisdiction of the City of Redmond on parcel #2726059041. After looping through the substation, the transmission line heads north within the new corridor across NE 124th Street and then onto the Cross Kirkland Corridor until reaching I-405 (parcels #2726059019, 2826059202, and 2826059027). The transmission line will cross I-405 to a parcel owned by the City of Kirkland (parcel #2826059115) and then run north along the west side of 120th Avenue NE in the street right-of-way. At the intersection of 120th Avenue NE and NE 124th Street, the line will head west along the north side of NE 124th Street to where it will interconnect with PSE's existing Sammamish – Moorlands #1 transmission line. South of NE 124th Street poles will be replaced and a switch added for the interconnection. Poles will also be replaced along the existing corridor from south of NE 124th Street up to NE 128th Street (parcels #5077900140, 5077900170, 2926059021, 3754550000), and on the Juanita Substation site (parcel #2926059007).

B. Environmental Elements [HELP]

1. Earth [help]

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?

A majority of the project corridor is flat with slopes less than 10% in grade. There are isolated areas of engineered slope exceeding 40% along the former rail ballast in the former rail corridors within all three jurisdictions.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

A wide range of soil types are found along the project corridor. The Geotechnical Engineering Report prepared by Kleinfelder (January 2020) indicates that the proposed transmission line corridor traverses from the central portion of the Lake Washington Basin to the Sammamish River Valley through what is commonly referred to as the Totem Lake Channel.

City of Kirkland

Recent (post-glacial) deposits in the Totem Lake area consist of interbedded silty soils and peat that extend to a depth of over 30 feet below the existing ground surface. A north to south ridge runs east of Totem Lake and generally consists of glacially consolidated soils. These soils typically include glacial till, advanced outwash soils, and transitional beds that were deposited during the Fraser Glaciation and Pre-Frasser glaciation. Erosion has created valleys and gullies on both sides of the ridge.

Unincorporated King County

Along the Totem Lake Channel at the base of the ridge, where it meets the Sammamish River Valley, an older alluvium deposit is mapped as a transitional zone between the glacially consolidated soils and the young alluvial deposits in the Sammamish River Valley. Additionally, in various valleys and gullies, erosion has created sporadic landslide deposits along the base of the ridge.

City of Redmond

The Sammamish River Valley runs north to south and contains the Sammamish River, which runs through the middle of the valley. Recent (young) alluvial deposits cover much of the valley and consist of mostly sand and organic-rich soils with some peat deposits. Soils within this deposit are generally classified as soft to firm for fine-grained soils and range from loose to dense for granular soils.

See Geotechnical Engineering Report for specific soils identified through geotechnical boring.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

There are no surface indications or known history of unstable soils in the immediate vicinity of the project corridor.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

City of Redmond

Within the City of Redmond, an auger or vactor truck will be used to remove spoils in order to install poles. The amount of excavation per pole is dependent upon the pole size and installation type (direct embed or foundation). Generally 5 cubic yards of spoils will be excavated for each direct embed pole, with 3.5 cubic yards of backfill. For poles with foundations, approximately 150 cubic yards of excavation and 150 cubic yards of fill is estimated. For the two H-frame poles, the quantities will be equivalent to two direct embed wood poles per H-frame. No additional grading will occur for pole installation. For the construction access road and associated culvert replacement, approximately 2,400 cubic yards of cut and 5,500 cubic yards of fill is estimated within the 1.36 mile segment. Cut material will be left onsite.

At Sammamish Substation, approximately 24 cubic yards of cut and 24 cubic yards of fill is anticipated in order to install equipment foundations within the existing substation yard.

Total Estimated Quantities for City of Redmond: Cut = 3,485 cubic yards Fill = 6,530 cubic yards

Unincorporated King County

Within unincorporated King County, four wood poles and one steel pole will be installed. The wood poles will be direct embed with backfill with approximately 5 cubic yards of excavation and 3.5 cubic yards of fill per pole. The steel pole will include a drilled pier foundation, with and approximately 150 cubic yards of excavation and 150 cubic yards of concrete fill for the foundation. For the 0.24 miles of access road and replacement of two culverts, grading of an estimated 850 cubic yards of cut and 1,750 cubic yards of fill will occur. All cut material will be left onsite.

Total Estimated Quantities for unincorporated King County: Cut = 1,020 cubic yards Fill = 1,915 cubic yards

City of Kirkland

Within the City of Kirkland, pole types will include direct embed wood and steel, as well as steel poles on pier and pile foundations and glu laminate poles. For direct embedded poles, generally 5 cubic yards of spoils will be excavated and 3.5 cubic yards of backfill will be used. For poles with concrete foundations, 150 cubic yards of excavation and 150 cubic yards of fill is estimated.

Work at the Totem Substation to accommodate the transmission loop will include an estimated 35 cubic yards of cut and 45 cubic yards of fill material to install equipment foundations within the existing substation yard.

Total Estimated Quantities for the City of Kirkland: Cut = 1,095 cubic yards Fill = 1,020 cubic yards

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Temporary construction activities may result in erosion, particularly in areas of excavation and grading for the access road and culvert replacement within the City of Redmond and unincorporated King County.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

City of Redmond and Unincorporated King County

Within the transmission line corridor negligible impervious surface will result from pole caps associated with pole foundations on select poles south of Sammamish Substation and equipment foundations within the substation yard that is already graveled. The gravel access and maintenance road will involve widening and grading of an existing gravel compact ballast from approximately 10 feet in most areas to 17 feet in width. Along the 1.6 mile access road corridor, approximately 2.04 acres is currently impervious and the access road will result in approximately 3.24 acres of new and replaced impervious surface. The approximate impervious coverage for each parcel the access road will cross is:

0325059019 (Redmond): 17 percent 3426059023 (Redmond): 23 percent 2726059140 (Redmond): 17 percent 2726059145 (King County): 18 percent

City of Kirkland

Within the transmission line corridor negligible impervious surface will result from pole caps associated with pole foundations on select poles. These poles are scattered throughout the project corridor. Equipment foundations will be installed within Totem Substation in Kirkland will be installed within the existing gravel substation yard.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Standard erosion control best management practices (BMPs) will be employed during construction. A project SWPPP and TESC plan will be implemented during construction. Stormwater features have been included in the access road design, including infiltration trenches. The side slopes along the access road will generally be limited to 3:1.

2. Air [help]

a. What types of emissions to the air would result from the proposal during construction. operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

There will be no on-going emissions from the project once it is complete. During construction there could be minor dust from construction activities and exhaust from construction equipment, however activities will be temporary in nature.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No off-site sources of emissions or odor will affect the proposal.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

If necessary, water will be used to control dust. Idling of construction vehicles will be limited.

3. Water [help]

- a. Surface Water: [help]
 - 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

There are streams and wetlands within the immediate vicinity and that overlap with the project corridor. These include:

Wetlands

Wetland Name	Category		
City of Redmond			
Substation	=		
Wetland B			
Substation	=		
Wetland C			
R-A	—		
R-C	=		
ROS-A	=		
R-D			
ROS-B			
R-E	II		
R-GCA			
R-GCB			
King County			
KC-A	I		
КС-В			
City of Kirkland			
K-B	IV		
K-C	III		
K-D	III		
K-DD	III		
K-E	IV		
K-F			

K-G	III
K-H	III
K-J	Ι
K-K	III
K-L	I
K-HF	II

Streams

Stream Name	Classification	Associated Wetland]
	- ,		
Willows Creek		Wetland C	I ne project
Gun Club Creek	Class III	R-A, R-GCA, R-GCB	area drains
Stream R-2	Class III	R-C	into the
Stream R-3	Class III	R-D	Sammamish
York Creek	Class III	R-E	River.
124 th Street Stream	Class III	none	
	2) Will the		
Stream KC-1	Type N	KC-A	project
124 th Street Stream	Type F	none	require any
	work over,		
Stream K-3	Type F	K-J	in, or
Stream K-5	Type Np	K-L	adjacent to
Stream K-6	Type Np	K-K	feet) the
Stream K-7	Type Np	K-B	described

waters? If yes, please describe and attach available plans.

The project will require work within and adjacent to some of the surface water bodies listed above. These include:

City of Redmond: The replacement and/or relocation of 6 poles will occur south of Sammamish Substation within Wetland C associated with realigning the bays within the substation to support the new transmission line project. Pole 0/2 of the SAM-MOR transmission line south of Sammamish Substation will be replaced within a wetland buffer and Pole 0/20 east of Willows Road NE will be installed with impacts to a buffer. The construction access road will not permanently impact any wetlands or streams. Permanent impacts will occur within functional buffers, including buffers associated with Wetlands R-GCA, R-C, R-D, R-E and offsite Wetland ROS-A.

Unincorporated King County: No poles will be installed in wetlands or buffers within unincorporated King County.

City of Kirkland: Poles 2/14, 2/14 stub pole, 2/15, 2/16, and 2/21 will partially intrude into wetlands along the ERC and CKC corridors. Pole 4/10 will be replaced within Wetland K-L south of Juanita Substation. Poles 2/3, 2/15, 2/21, and 3/2 will have impacts to buffers. Seventeen (17) trees have been identified for removal within wetlands in the City of Kirkland corridor and 69 trees within buffers.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

City of Redmond

Within the City of Redmond, fill impacts will occur in the transmission corridor south of the Sammamish Substation from replacement poles within Wetland C. The resulting net fill will be approximately 130 square feet. Approximately 30 square feet of fill will also occur within Wetland R-C for the access road and culvert replacement work. Temporary grading will occur below the OHMW of Stream R-2 in order to install a replacement culvert.

Unincorporated King County

No dredge or fill impacts will occur within unincorporated King County. Temporary grading will occur below the OHWM of Stream KC-1 in order to replace the existing culvert.

City of Kirkland

Impacts from 7 poles in wetlands (six which partially overlap with the wetlands), including one replacement pole in Wetland K-L will result in approximately 55 square feet of fill.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No permanent surface water withdrawals or diversions will occur as a result of this project. Temporary stream impacts will result in the City of Redmond and unincorporated King County during culvert replacement from grading.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

The proposal does not lie within a 100-year floodplain.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

The proposed project does not involve any discharges of waste materials to surface waters.

- b. Ground Water: [help]
 - 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities

withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

Groundwater will not be withdrawn from a well for any purpose as part of the proposed project.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Waste material will not be discharged into the ground from any source as part of the proposed project.

- c. Water runoff (including stormwater):
 - Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Stormwater runoff could occur along the project route. Stormwater as a result of poles will be negligible. Widening of the existing rail ballast in the City of Redmond and unincorporated King County will increase stormwater runoff from the site. Stormwater from the construction access and maintenance road will flow downslope to the east into infiltration trenches that will be used to store and infiltrate runoff.

Existing stormwater facilities at Sammamish Substation in the City of Redmond and Totem Substation in the City of Kirkland will contain and treat additional stormwater flows that result from the equipment foundations installed within the existing substation yards.

2) Could waste materials enter ground or surface waters? If so, generally describe.

No waste materials are anticipated to be generated from this project, so no impacts to ground or surface water are anticipated.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

The proposed project will positively impact drainage patterns in the vicinity of the site through the replacement of seven culverts that carry stormwater and regulated stream flow under the existing rail ballast. Three culverts carrying regulated stream flow and two culverts conveying stormwater will be replaced within the City of Redmond and one culvert supporting a regulated stream and one culvert conveying stormwater will be replaced in unincorporated King County. The regulated stream culverts will meet WDFW fish passage standards. The stormwater culverts will meet standards for 100-year flows.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Erosion control BMPs will be implemented during construction to control temporary runoff during excavation and fill activities. An infiltration trench will be installed along the eastern edge of the gravel access road in the City of Redmond and unincorporated King County. Negligible stormwater runoff will result from installed poles, therefore infiltration of any runoff will occur. Existing stormwater facilities at the Sammamish and Totem Substations will accommodate additional stormwater runoff from the proposed substation improvements.

- 4. Plants [help]
- a. Check the types of vegetation found on the site:
 - ___X_deciduous tree: <u>alder</u>, <u>maple</u>, <u>aspen</u>, <u>other</u>
 - ___X_evergreen tree: <u>fir</u>, <u>cedar</u>, <u>pine</u>, other

__X_shrubs

__X_grass

____pasture

____crop or grain

____ Orchards, vineyards or other permanent crops.

- ____X_wet soil plants: <u>cattail</u>, <u>buttercup</u>, bullrush, <u>skunk cabbage</u>, other
- ____water plants: water lily, eelgrass, milfoil, other
- __X__other types of vegetation
- b. What kind and amount of vegetation will be removed or altered?

Trees will be removed to meet the required clearance standards from the transmission line conductor. Estimated tree removal numbers are:

City of Redmond: 45 trees

Unincorporated King County: 10 trees

City of Kirkland: 295 trees

b. List threatened and endangered species known to be on or near the site.

There are no known threatened or endangered plant species on or near the project corridor.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

City of Redmond

SEPA Environmental checklist (WAC 197-11-960)

For trees removed outside of critical area buffers, PSE will pay into the City of Redmond tree fund per RZC 21.72.080E(2). For trees within critical area buffers, PSE will mitigate impacts by providing functional lift in the transmission corridor south of Sammamish Substation as part of the Willows Creek Stream Relocation Project.

Unincorporated King County

No tree replacement is required under the King County Zoning Code. PSE will work with the property owner, the City of Redmond to determine appropriate tree mitigation measures prior to submittal of the Clearing and Grading Permit to King County.

City of Kirkland

For trees removed within street right-of-way or on PSE or City-owned property other than the Cross Kirkland Corridor (CKC), PSE will provide a tree restoration plan to plant transmission compatible vegetation near the trees removed in compliance with City requirements. For trees within the CKC, PSE will pay a tree mitigation fee to the City of Kirkland so compatible vegetation can be replanted at such time as the City implements their CKC Master Plan and widens and improves the existing trail in the foreseeable future. For trees on private property located within critical area buffers, PSE will provide mitigation through the purchase of applicable credits at the Keller Farm Mitigation Bank in the City of Redmond. For trees on private property outside of critical areas and buffers, PSE will work with individual property owners to provide transmission compatible landscaping in compliance with applicable City of Kirkland code requirements.

e. List all noxious weeds and invasive species known to be on or near the site.

Himalayan blackberry, reed canary grass.

5. Animals [help]

a. <u>List</u> any birds and <u>other</u> animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, <u>heron</u>, <u>eagle</u>, <u>songbirds</u>, other: mammals: deer, bear, elk, beaver, other: fish: bass, <u>salmon</u>, <u>trout</u>, herring, shellfish, other _____

b. List any threatened and endangered species known to be on or near the site.

No known threatened or endangered species are on or near the project corridor.

c. Is the site part of a migration route? If so, explain.

The City of Kirkland, the City of Redmond, and unincorporated King County are located along the Pacific Flyway, a known avian migration route.

d. Proposed measures to preserve or enhance wildlife, if any:

Wildlife enhancement will be provided through culvert replacement with fish passable culverts and associated enhancements under the gravel construction access and maintenance road in the City of Redmond and unincorporated King County and through consolidated mitigation for City of Redmond impacts to critical areas and buffers as part of the Willows Creek Relocation Project.

Wildlife enhancement will occur within the City of Kirkland through tree restoration in street rights-of-way, on PSE and City-owned property, and on private property outside of critical areas. Consolidated mitigation for critical area and buffer impacts on private property will be accomplished through the purchase of mitigation credits at the Keller Farm Mitigation Bank in the City of Redmond.

e. List any invasive animal species known to be on or near the site.

There are no known invasive animal species to be on or near the project corridor.

6. Energy and Natural Resources [help]

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The project is the construction of a new electrical transmission line. The completed project will provide electrical capacity and reliability to serve residences and businesses.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The project will not affect the potential use of solar energy by adjacent properties.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

No energy conservation features are included in the proposal, as no impacts are identified or anticipated.

7. Environmental Health [help]

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

There are no known environmental health hazards that could occur as a result of this proposal.

1) Describe any known or possible contamination at the site from present or past uses.

There are no known site contamination.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

There are no known existing hazardous chemicals/conditions that might affect project development and design. The project will aerially cross the existing Olympic Pipeline corridor, which also includes existing PSE transmission lines. PSE will notify Olympic Pipeline prior to construction activity. (KZC 118.50.3)

 Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

No hazardous or toxic materials will be used during the construction of the transmission line or during the operating life of the project.

4) Describe special emergency services that might be required.

No special emergency services will be required.

5) Proposed measures to reduce or control environmental health hazards, if any:

No measures are proposed, as no environmental health hazards have been identified or anticipated.

- b. Noise
 - 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

No noise impacts in the vicinity of the transmission line corridor will affect the proposed project.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

There will be short term noise generated by construction vehicles and equipment. There will be no long-term noise impacts from the project. Noise from the transmission line and additional substation equipment will not be audible above ambient noise levels.

3) Proposed measures to reduce or control noise impacts, if any:

Construction will be limited to permitted hours as regulated through the local jurisdiction noise ordinances.

8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The majority of the transmission line corridor will be located on property owned by the Cities of Redmond and Kirkland and King County designated for current or future multi-use corridors, including public trail use, other utilities and potentially transit; as well as within street right-of-way.

City of Redmond

Within the City of Redmond, the project will commence at Sammamish Substation. South of Sammamish Substation, PSE owns property that serves as a transmission corridor for multiple transmission lines. The substation property is surrounded by industrial and office park development. On the east side of Willows Road NE, the transmission line will be on easement within parcels owned by the City of Redmond formally used as a rail corridor. The southern extent of the project east of Willows Road NE will parallel the Redmond Central Connector (RCC) Phase 2 to its terminus south of the frontage of Overlake Christian Church. The corridor between this point and the northern city limits contains an unimproved gravel rail ballast. To the east of the City of Redmond parcels is business park development, Willows Run Golf Course and a City of Redmond property to be used as a future park (Sammamish Valley Park). After entering the City of Kirkland, the project includes the replacement of two H-frame poles south of NE 124th Street within the City of Redmond in an existing transmission line corridor adjacent to vacant property to the east that is proposed to be developed with multi-family townhomes and to the west office park. The project corridor enters Totem Substation through an existing transmission line corridor south of NE 124th Street in the Citv of Redmond that runs along the property line through a business park parcel adjacent to an auto repair business in the City of Kirkland to the west.

King County

The project includes 5 transmission poles within unincorporated King County that will be located within the former rail corridor parcel owned by the City of Redmond. The parcel contains a former rail ballast with the rail still intact. There are two parcels to the east of the City of Redmond parcel formerly used for agriculture that are owned by King County Department of Natural Resources and Parks (DNRP).

City of Kirkland

Within the City of Kirkland, the project corridor will predominantly be located within street rightof-way or along the Cross Kirkland Corridor (CKC) public trail. Along NE 124th Street, the

transmission line will be located within the right-of-way adjacent to business park and industrial development. The Totem Substation where the transmission line will loop through, is surrounded by auto-related businesses and an apartment complex. North of NE 124th Street, the corridor is surrounded by car dealerships and industrial and business park uses along the CKC. The corridor to the east of 132nd Avenue NE contains an existing rail ballast with the rails intact that is planned for the future King County ERC trail. To the west of 132nd Ave NE, the former rail corridor contains the CKC gravel trail. Near the CKC intersection with Totem Lake Boulevard, the City's Totem Lake Park is located north of the trail corridor. West of Totem Lake Boulevard, uses adjacent to the CKC include retail and storage uses. West of the I-405 crossing, the transmission line will run adjacent to the I-405 right-of-way, along 120th Ave NE near retail and office development. Along NE 124th Street west of the 120th Ave NE intersection, the transmission line will be located within street right-of-way adjacent to commercial, retail, and multi-family development. The existing Sammamish – Moorlands #1 corridor south and north of NE 124th Street runs adjacent to multi-family, high school, singlefamily residential development, as well as through an open space tract. The Juanita Substation is located within a single-family residential area.

The proposed transmission line will not impact uses on adjacent parcels or public trail uses within the CKC. Utility corridors often serve as trail corridors and PSE has a franchise to locate the transmission line within street right-of-way. On private property, the transmission corridor will be located close to property lines to prevent interference with the primary uses on the properties.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The project corridor has not been used as farmlands or working forest lands. Within the City of Redmond and unincorporated King County, the project corridor will be located within a former railroad corridor. Within the City of Kirkland, the corridor will be located within the CKC – a former railroad corridor and on easement on commercial or multi-family residential property or within street right-of-way. No agricultural or forest land will be converted to other uses as a result of this project.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

The project will not affect or be affected by surrounding working farm or forest land business operations. There are no forest lands near the project corridor. A working farm is located between the corridor and the Sammamish River within unincorporated King County. c. Describe any structures on the site.

There are no structures within the proposed transmission corridor.

d. Will any structures be demolished? If so, what?

No structures will be demolished as part of this project.

e. What is the current zoning classification of the site?

<u>City of Kirkland</u> Transmission Line Corridor: TL4B, TL7B, TL7A, TL6A, TL6B, TL10B, RM 3.6, TL11, MDR Juanita Substation: RSX 7.2 Totem Substation: RM2.4

<u>City of Redmond</u> Sammamish Substation: MP/BP Transmission Line Corridor: BP, MP, UR

<u>King County</u> Transmission Line Corridor: A-10

f. What is the current comprehensive plan designation of the site?

<u>City of Kirkland</u> Transmission Line Corridor: IND, IND/COM, BP, C, MDR Juanita Substation: LDR Totem Substation: HDR

<u>City of Redmond</u> Sammamish Substation: Manufacturing Park, Park and Open Space Transmission Line Corridor: Manufacturing Park, Urban Recreation, Park and Open Space

<u>King County</u> Agriculture

g. If applicable, what is the current shoreline master program designation of the site?

The project is not located within shoreline jurisdiction, therefore a shoreline master program designation is not applicable.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

The project corridor contains wetlands and stream segments that are classified as critical areas by the City of Redmond, King County, and the City of Kirkland. Additionally, landslide geohazard and seismic hazard areas are mapped critical areas along the project alignment within the City of Kirkland trail corridor and portion of the existing transmission line corridor between NE 124th Street and NE 128th Street. The corridor along the east side of Willows Road NE within unincorporated King County and the City of Redmond is within a seismic hazard area.

i. Approximately how many people would reside or work in the completed project?

No one will reside or work within the completed project corridor.

j. Approximately how many people would the completed project displace?

The completed project will not displace anyone.

k. Proposed measures to avoid or reduce displacement impacts, if any:

No measures are proposed, as no impacts will result from the proposed project.

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

PSE has coordinated with the underlying property owners of the former rail corridors (City of Kirkland and City of Redmond), along with other current or future users of the corridors regarding the location of the transmission line, including pole placement, within the multi-use parcels.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Impacts to agricultural and forest lands of long-term commercial significance are not anticipated as a result of the proposal; therefore no measures are proposed.

9. Housing [help]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

No housing units will be provided by this project.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

No housing units will be eliminated by this project.

c. Proposed measures to reduce or control housing impacts, if any:

Impacts to housing will not occur as a result of the proposal, as no housing is included or will be eliminated. Therefore, no measures are proposed.

10. Aesthetics [help]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

There are no structures included with this proposal. The project will include above ground transmission line poles and wires; ranging from approximately 36 to 94 feet in height. One pole within the fence line of the Sammamish Substation will be 114 feet tall.

b. What views in the immediate vicinity would be altered or obstructed?

Territorial views east of Willows Road NE in the City of Redmond and views along the CKC in the City of Kirkland will be slightly altered by the presence of the transmission line; however the poles and wires will not obstruct any views.

c. Proposed measures to reduce or control aesthetic impacts, if any:

Measures to reduce aesthetic impacts include using similar pole types, heights and span lengths where feasible.

11. Light and Glare [help]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Glare is not anticipated to occur as part of the proposal.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

Glare is not anticipated to be a safety hazard created by the finished project .

c. What existing off-site sources of light or glare may affect your proposal?

No off-site sources of light and glare will affect the project.

d. Proposed measures to reduce or control light and glare impacts, if any:

No measures are proposed as no impacts are anticipated.

12. Recreation [help]

a. What designated and informal recreational opportunities are in the immediate vicinity?

City of Redmond: Willows Run Golf Complex, Sammamish Valley Park (undeveloped), Redmond Central Connector regional trail

City of Kirkland: Cross Kirkland Corridor regional trail, King County regional trail, Totem Lake Park, Juanita High School sports fields

b. Would the proposed project displace any existing recreational uses? If so, describe.

Recreational uses would not be displaced. The proposal is designed to share the same corridor as existing and future recreational uses. Temporary impacts to the CKC may occur during construction and result in temporary trail closures.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

PSE has coordinated with shared easement users, including the Cities of Kirkland and Redmond, King County Parks and Wastewater, and Sound Transit. Temporary trail closures will be coordinated with the City of Kirkland.

13. Historic and cultural preservation [help]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.

HRA's cultural resource assessment (December 2019)assessed properties 35 years or older and found the following properties that are listed in or eligible for listing in national, state, or local preservation registers:

City of Redmond

11811 Willows Road NE, WISAARD Property #710050, 1974 - Eligible 10525 Willows Road NE, WISAARD Property #710052, 1981 - Undetermined 9221 Willows Road NE, WISAARD Property #710056, 1967 – Eligible only as a contributing resource to a potential historic district. 12515 Willows Road NE, WISAARD Property #720422, 1984 – Eligible for the King County Historic Register 11595 139th Place NE, WISAARD Property #720431, ca. 1964 - Eligible only as a contributing resource to a potential historic district. 11550 139th Place NE, WISAARD Property #720432, ca. 1968 – Eligible only as a contributing resource to a potential historic district. 11650 139th Place NE, WISAARD Property #720435, 1981 – Eligible for King County Historic Register 10301 Willows Road NE, WISAARD Property #720436, 1984 – Eligible for King County Historic Register 10201 Willows Road NE, WISAARD Property #720437, 1984 – Eligible for King County Historic Register

King County

None

City of Kirkland

13225 NE 126th Place, WISAARD Property #710043, 1974 - Undetermined 12545 135th Avenue NE, WISAARD Property #710046, 1973 - Undetermined

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

HRA conducted a cultural resources assessment (December 2019) within the project APE and documented two historic railroad grades which were determined not eligible.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

HRA performed archival research including previous cultural resource studies within ½ mile of the APE, assessment of historic-period maps, and use of a DAHP predictive model; pedestrian surveys including subsurface shovel probes within the project corridor and an architectural inventory. In 2017, PSE distributed fieldwork notification letters to agencies, potentially interested parties, and Native American Tribes with a potential interest within the defined APE for the project.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

HRA provided recommendations of proposed measures to avoid or minimize disturbance to resources. For Poles 04/ - 1/13 within the City of Redmond, HRA recommends archaeological monitoring during pole excavation. The alluvial sediments below the railroad fill in this areas have the highest probability of containing intact precontact archaeological materials. No other monitoring is recommended.

For Poles 1/14 through 4/17 and pole replacement in the existing corridor south of NE 124th Street in the City of Kirkland, HRA recommends Archaeological Awareness Training for the construction crews as well as ensuring an Inadvertent Discovery Plan (IDP) is in place prior to construction start.

14. Transportation [help]

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The proposed transmission line project will be located on easement, within street right-of-way, or on PSE owned property that is all currently accessible by public streets. The project does

not require access aside from occasional maintenance access. Existing public streets and highways are shown on site plans, as applicable.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The general project area is served by various King County Metro routes. Public transit is not applicable to this transmission line project.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

The proposal will neither provide nor eliminate parking spaces.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

The proposal will not require new or improvements to existing public roads, streets, pedestrian, bicycle, or state transportation facilities, as the project will not generate vehicle, bicycle or pedestrian traffic. A gravel construction access and maintenance road is proposed to be constructed on City of Redmond property due to limited access for construction of the transmission line along the east side of Willows Road NE in the City of Redmond and unincorporated King County.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

The proposal will not use or occur in the immediate vicinity of existing water, rail, or air transportation.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The completed project will not generate vehicle trips per day. Maintenance vehicles will visit areas along the transmission corridor up to once a month.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

The proposal will not interfere with, affect or be affected by the movement of agricultural forest products on roads or streets in the area. The transmission line is not impacted by nor will impact activity on roads or streets and there is no agricultural or forest product use in the vicinity of the project.

h. Proposed measures to reduce or control transportation impacts, if any:

No measures are proposed to reduce or control transportation impacts, as no impacts are anticipated.

15. Public Services [help]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The project will not result in an increased need for public services. The project is a transmission line.

b. Proposed measures to reduce or control direct impacts on public services, if any.

No measures are proposed, as no impacts are anticipated.

16. Utilities [help]

- a. Circle utilities currently available at the site: <u>electricity</u>, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____
 - e. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

The project is a transmission line. No additional utilities are proposed for the project.

C. Signature [HELP]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:	Kerry Kriner	
Name of signee	e <u>Kerry Kriner</u>	
Position and Ag	gency/Organization <u>Senior Land Planner</u>	
Date Submitted	d: <u>2/18/2020; updated 10/23/20</u>	

D. Supplemental sheet for nonproject actions [HELP]

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.



Background ESRI World Imagery Data Sources City of Kirkland, King County GIS, DEA.

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ATTACHMENT 3 SEP20-00106 - Plan Set



ATTACHMENT 3 SEP20-00106 - Plan Set



